



August 28, 2024

THIS LETTER SENT VIA EMAIL TO: [Hillary.Kunins@sfdph.org](mailto:Hillary.Kunins@sfdph.org)

Dr. Hillary Kunins, MD, MPH, MS, Director  
Behavioral Health Services and Mental Health SF  
San Francisco Department of Public Health  
1380 Howard Street  
San Francisco, CA 94103

SUBJECT: ANNUAL COUNTY COMPLIANCE SECTION DMC-ODS FINDINGS  
REPORT

Dear Director Kunins:

The Department of Health Care Services (DHCS) is responsible for monitoring compliance to requirements of the Drug Medi-Cal Organized Delivery System (DMC-ODS) Intergovernmental Agreement operated by San Francisco County.

The County Compliance Section (CCS) within Audits and Investigations (A&I) of DHCS conducted a review of the County's compliance with Federal and State regulations, program requirements and contractual obligations based on supporting documentation and interviews with County staff. Enclosed are the results of San Francisco County's Fiscal Year (FY) 2023-24 DMC-ODS compliance review. The report identifies deficiencies, advisory recommendations, and referrals for technical assistance.

San Francisco County is required to submit a Corrective Action Plan (CAP) addressing each compliance deficiency (CD) noted to DHCS' Medi-Cal Behavioral Health – Oversight and Monitoring Division (MCBH-OMD), County/Provider Operations and Monitoring Branch (CPOMB). For questions regarding the CAP process and submitting documentation, email your questions to [MCBHOMDMonitoring@dhcs.ca.gov](mailto:MCBHOMDMonitoring@dhcs.ca.gov).

If you have any questions, please contact me at [michael.bivians@dhcs.ca.gov](mailto:michael.bivians@dhcs.ca.gov).

Sincerely,

Michael Bivians | Unit Chief

Distribution:

To: Director Kunins,

Cc: Mateo Hernandez, Chief  
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Monitoring Branch

Nancy Yu, Regulatory Affairs Manager  
San Francisco Department of Public Health, Behavioral Health Services

## COUNTY REVIEW INFORMATION

**County:**

San Francisco

**County Contact Name/Title:**

Nancy Yu / Regulatory Affairs Manager

**County Address:**

1380 Howard Street  
San Francisco, CA 94103

**County Phone Number/Email:**

(415) 255-3938  
nancy.c.yu@sfdph.org

**Date of DMC-ODS Implementation:**

7/01/2017

**Date of Review:**

2/13/2024

**Lead CCM Analyst:**

Michael Bivians

**Assisting CCM Analyst:**

N/A

**Report Prepared by:**

Michael Bivians

**Report Approved by:**

Ayesha Smith

## REVIEW SCOPE

### I. Regulations:

- a. California Code of Regulations, Title 22, section 51341.1, 51490.1 and 51516.1 – Drug Medi-Cal Substance Use Disorder Services
- b. California Code of Regulations, Title 9, Division 4: Department of Alcohol and Drug Programs
- c. Health and Safety Code, Division 10.5, Section 11750 – 11970: Alcohol and Drug Programs
- d. Welfare and Institutions Code, Division 9, Part 3, Chapter 7, Sections 14000, et seq.; 14100.2, 14021, 14021.51-14021.53, 14021.6, and 14124.20-14124.25, 14184.402, 14059.5: Basic Health Care – Drug Medi-Cal Treatment Program

### II. Program Requirements:

- a. Fiscal Year (FY) 2022-23 DMC-ODS Intergovernmental Agreement (IA)
- b. State of California *Adolescent Best Practices Guidelines October 2020*
- c. DHCS' *Perinatal Practice Guidelines FY 2018-19*
- d. DHCS' *Minimum Quality Drug Treatment Standards (Document 2F(a))*
- e. National Culturally and Linguistically Appropriate Services (CLAS)
- f. Mental Health and Substance Use Disorders Services (MHSUDS) Information Notices
- g. Behavioral Health Information Notices (BHIN)

## **ENTRANCE AND EXIT CONFERENCE SUMMARIES**

### **Entrance Conference:**

An Entrance Conference was conducted via Teams on 2/13/2024. The following individuals were present:

- Representing DHCS:  
Michael Bivians, County Compliance Monitoring 2 (CCM2) Unit Chief  
Mary Shanahan, County/Provider Oversight and Monitoring Branch (CPOMB) Liaison  
Elida Boyden, CPOMB Liaison
- Representing San Francisco County:  
Adela Morales, San Francisco Behavioral Health Services (SFBHS) Access Line Program Coordinator  
Alecia Martin, SFBHS Director, Quality Management and Regulatory Affairs  
Ana Gonzalez, SFBHS Chief Medical Officer  
Chet Valentino, SFBHS Director, Data Analytics and Evaluation  
Chris Lovoy, SFBHS Assistant Director, Children, Youth, and Families (CYF)  
Christy Soran, SFBHS Deputy Medical Director of Substance Use Services  
Clifford Gee, San Francisco Department of Public Health (SFPDH) Principal Administrative Analyst, Fiscal  
David Pating, SFBHS Residential System of Care (SOC) Medical Director  
Dean Goodwin, SFPDH Manager of Community-Based Organization Contracting  
Elissa Velez, SFPDH Contract Compliance Manager  
Erik Dubon, SFBHS Substance Use Disorder (SUD) SOC Project Manager  
Grace Fung, SFBHS TAP Program Manager  
Heather Weisbrod, SFBHS Director, Office of Coordinated Care  
Hillary Kunins, SFBHS Director  
Imo Momoh, SFBHS Director, BHS Managed Care  
Israel Alleyne, SFPDH Contract Compliance Coordinator  
Jena Jenson, SFBHS Eligibility Lead  
Jerna Reyes, SFPDH Director, Business Office of Contract Compliance  
Jessica Brown, SFBHS Director, Office of Justice, Equity, Diversity, and Inclusion  
Joe Turner, SFPDH Compliance Officer  
Kellee Hom, SFBHS Clinical Informaticist  
Kim Oka, SFPDH Privacy Office  
Kitty Ha, SFBHS Mental Health Plan Quality Improvement (QI) Coordinator

Laurel Snead, SFBHS Principal Administrative Analyst  
Lenh Tsan, SFBHS SUD QI Coordinator  
Liliana Delarosa, SFBHS SUD SOC Program Coordinator  
Lorrie Tanioka, SFBHS Billing Director  
Maximilian Rocha, SFBHS SUD SOC, Interim AOD Administrator  
Melissa Bloom, SFBHS Risk Manager  
Michael Barack, SFBHS SUD Training Officer  
Michael Rojas, SFBHS Regulatory Affairs Program Coordinator  
Michelle O'Neal, SFBHS Contract Compliance Manager  
Michelle Truong, SGBHS SUD SOC Quality Specialist  
Nanalisa Rasaily, SFBHS Patients Accounts Manager  
Rebecca Mathew, SFBHS CYF SUD SOC Program Manager  
Renelda Dimatulac, SFBHS SUD SOC Administrative Clerk  
Ryan Fuimaono, SFBHS Residential SUD SOC Program Manager  
Nancy Yu, SFBHS Regulatory Affairs Manager  
William Gramlich, SFBHS Grievance and Appeal Officer  
Yuk Kiu Lee, SFBHS Network Adequacy Analyst

During the Entrance Conference, the following topics were discussed:

- Introductions.
- DHCS overview of review process.
- County overview of services provided.

## **Exit Conference:**

An Exit Conference was conducted via Teams on 2/13/2024. The following individuals were present:

- Representing DHCS:  
Michael Bivians, CCM2 Unit Chief  
Mary Shanahan, CPOMB Liaison  
Elida Boyden, CPOMB Liaison
- Representing San Francisco County:  
Adela Morales, SFBHS Access Line Program Coordinator  
Alecia Martin, SFBHS Director, Quality Management and Regulatory Affairs  
Ana Gonzalez, SFBHS Chief Medical Officer  
Chet Valentino, SFBHS Director, Data Analytics and Evaluation  
Chris Lovoy, SFBHS Assistant Director, Children, Youth, and Families (CYF)  
Christy Soran, SFBHS Deputy Medical Director of Substance Use Services  
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Erik Dubon, SFBHS Substance Use Disorder (SUD) SOC Project Manager  
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Hillary Kunins, SFBHS Director  
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Joe Turner, SFDPH Compliance Officer  
Kellee Hom, SFBHS Clinical Informaticist  
Kim Oka, SFDPH Privacy Office  
Kitty Ha, SFBHS Mental Health Plan Quality Improvement (QI) Coordinator  
Laurel Snead, SFBHS Principal Administrative Analyst  
Lenh Tsan, SFBHS SUD QI Coordinator  
Liliana Delarosa, SFBHS SUD SOC Program Coordinator  
Lorrie Tanioka, SFBHS Billing Director  
Maximilian Rocha, SFBHS SUD SOC, Interim AOD Administrator

Melissa Bloom, SFBHS Risk Manager  
Michael Barack, SFBHS SUD Training Officer  
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Nancy Yu, SFBHS Regulatory Affairs Manager  
William Gramlich, SFBHS Grievance and Appeal Officer  
Yuk Kiu Lee, SFBHS Network Adequacy Analyst

During the Exit Conference, the following topics were discussed:

- Submitting follow-up evidence
- Due date for evidence submission



## SUMMARY OF FY 2023-24 COMPLIANCE DEFICIENCIES (CD)

<b><u>Category</u></b>	<b><u>Number of CDs</u></b>
1.0 Availability of DMC-ODS Services	0
2.0 Care Coordination	0
3.0 Quality Assurance and Performance Improvement	0
4.0 Access and Information Requirements	0
5.0 Coverage and Authorization of Services	1
6.0 Beneficiary Rights and Protections	0
7.0 Program Integrity	1

## **CORRECTIVE ACTION PLAN (CAP)**

Pursuant to the Intergovernmental Agreement, Exhibit A, Attachment I, Part III, Section QQ each CD identified must be addressed via a CAP.

Your CPOMB liaison manages the progress of CAP completion.

For questions regarding the CAP form and instructions on how to complete the FY 2023-24 CAP, please email [MCBHOMDMonitoring@dhcs.ca.gov](mailto:MCBHOMDMonitoring@dhcs.ca.gov).

## **Category 5: COVERAGE AND AUTHORIZATION OF SERVICES**

A review of the County's Coverage and Authorization of Services was conducted to ensure compliance with applicable Federal and State regulations, program requirements, and contractual obligations. The following deficiency was identified:

### **COMPLIANCE DEFICIENCY:**

#### **CD 5.3.1:**

DMC-ODS Contract, Exhibit A Attachment I, Section III Program Specifications, LL, 4, c-g)

#### Open Admission and Open Provider Reporting

c. Electronic submission of CalOMS-Tx data shall be submitted by Contractor within 45 days from the end of the last day of the report month.

d. Contractor shall comply with data collection and reporting requirements established by the DHCS CalOMS-Tx Data Collection Guide (Document 3J) and all former Department of Alcohol and Drug Programs Bulletins and DHCS Information Notices relevant to CalOMS-Tx data collection and reporting requirements.

e. Contractor shall submit CalOMS-Tx admission, discharge, annual update, resubmissions of records containing errors or in need of correction, and "provider no activity" report records in an electronic format approved by DHCS.

f. Contractor shall comply with the CalOMS-Tx Data Compliance Standards established by DHCS identified in (Document 3S) for reporting data content, data quality, data completeness, reporting frequency, reporting deadlines, and reporting method.

g. Contractor shall participate in CalOMS-Tx informational meetings, trainings, and conference calls.

**Findings:** The County did not ensure timely submission of beneficiary annual updates to the CalOMS-Tx system.

## Category 7: PROGRAM INTEGRITY

A review of the County's Program Integrity was conducted to ensure compliance with applicable Federal and State regulations, program requirements, and contractual obligations. The following deficiency was identified:

### COMPLIANCE DEFICIENCY:

#### **CD 7.3.4:**

DMC-ODS Contract, Exhibit A Attachment I, Section II Federal Requirements, H, 5, ii, e

- e. Provision for a method to verify, by sampling or other methods, whether services that have been represented to have been delivered by network providers were received by beneficiaries and the application of such verification processes on a regular basis.

DMC-ODS Contract, Exhibit A Attachment I, Section III Program Specifications, HH, 1

1. Service Verification. To assist DHCS in meeting its obligation under 42 CFR 455.1(a)(2), the Contractor shall establish a mechanism to verify whether services were actually furnished to beneficiaries.

**Findings:** The Plan did not provide evidence that it implemented the mechanism to verify whether services were actually furnished to beneficiaries.

## **TECHNICAL ASSISTANCE**

San Francisco County did not request Technical Assistance during this review.