

DHCS AUDITS AND INVESTIGATIONS  
CONTRACT AND ENROLLMENT REVIEW DIVISION  
SUBSTANCE USE DISORDER REVIEW SECTION

**REPORT ON THE SUBSTANCE USE DISORDER  
(SUD) AUDIT OF GLENN COUNTY  
FISCAL YEAR 2024-25**

Contract Number: 23-30091

Contract Type: Drug Medi-Cal (DMC)

Audit Period: July 1, 2023 — June 30, 2024

Dates of Audit: February 4, 2025 — February 14, 2025

Report Issued: June 25, 2025

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## I. INTRODUCTION

Glenn County Behavioral Health (Plan) is governed by a Board of Supervisors and contracts with the Department of Health Care Services (DHCS) for the purpose of providing substance use disorder services to county residents.

Glenn County is located in the northern part of the California Central Valley. The Plan provides services within the unincorporated county and in the cities of Orland and Willows.

As of March 2025, the Plan had a total of 87 members receiving services and a total of four active providers.

## II. EXECUTIVE SUMMARY

This report presents the audit findings of the DHCS audit for the period of July 1, 2023, through June 30, 2024. The audit was conducted from February 4, 2025, through February 14, 2025. The audit consisted of documentation review, verification studies, and interviews with the Plan's representatives.

An Exit Conference with the Plan was held on June 5, 2025. The Plan was allowed 15 calendar days from the date of the Exit Conference to provide supplemental information addressing the draft audit findings. On June 24, 2025, the Plan submitted a response after the Exit Conference. The evaluation results of the Plan's response are reflected in this report.

The audit evaluated five categories of performance: Availability of Drug Medi-Cal Services (DMC) Services, Quality Assurance and Performance Improvement, Access and Information Requirements, Beneficiary Rights and Protection, and Program Integrity.

The prior DHCS compliance report, covering the review period from July 1, 2022, through June 30, 2023, identified deficiencies incorporated in the Corrective Action Plan (CAP). The prior year CAP was completely closed at the time of onsite. Therefore, this year's audit included a review of documents to determine the implementation and effectiveness of the Plan's corrective actions.

The summary of the findings by category follows:

### **Category 1 – Availability of Drug Medi-Cal Services**

There were no findings noted for this category during the audit period.

### **Category 3 – Quality Assurance and Performance Improvement**

There were no findings noted for this category during the audit period.

### **Category 4 – Access and Information Requirements**

The Plan must ensure its Medi-Cal Behavioral Health delivery systems, and their subcontractor can provide a member who is blind or visually impaired, and other individuals with disabilities, with communication materials in the individuals' requested alternative format(s). The standard alternative formats options are large

print, audio CD, data CD, and braille. The Plan did not ensure the availability of braille and data CD formats as an alternative communication material to members.

## **Category 6 – Beneficiary Rights and Protection**

There were no findings noted for this category during the audit period.

## **Category 7 – Program Integrity**

There were no findings noted for this category during the audit period.

### **III. SCOPE/AUDIT PROCEDURES**

#### **SCOPE**

The DHCS, Contract and Enrollment Review Division conducted the audit to ascertain that medically necessary services provided to Plan members comply with federal and state laws, Medi-Cal regulations and guidelines, and the State's DMC Contract.

#### **PROCEDURE**

DHCS conducted an audit of the Plan from February 4, 2025, through February 14, 2025, for the audit period of July 1, 2023, through June 30, 2024. The audit included a review of the Plan's policies for providing services, procedures to implement these policies, and the process to determine whether these policies were effective. Documents were reviewed and interviews were conducted with Plan representatives.

The following verification studies were conducted:

#### **Category 1 – Availability of Drug Medi-Cal Services**

There were no verification studies conducted for the audit review.

#### **Category 3 – Quality Assurance and Performance Improvement**

There were no verification studies conducted for the audit review.

#### **Category 4 – Access and Information Requirements**

There were no verification studies conducted for the audit review.

#### **Category 6 – Beneficiary Rights and Protection**

Grievance Procedures: Three grievances were reviewed for timely resolution, appropriate response to the complainant, and submission to the appropriate level for review.

#### **Category 7 – Program Integrity**

There were no verification studies conducted for the audit review.

# COMPLIANCE AUDIT FINDINGS

## Category 4 – Access and Information Requirements

### 4.1 LANGUAGE AND FORMAT REQUIREMENTS

#### 4.1.1 ALTERNATIVE FORMAT REQUIREMENTS

Medi-Cal Behavioral Health delivery systems (Plans, Drug Medi-Cal Organized Delivery System counties, and Drug Medi-Cal counties), and their subcontractors must provide a member who is blind or visually impaired, and other individuals with disabilities, with communication materials in the individual's requested alternative format(s). The standard alternative formats options are large print, audio CD, data CD, and braille. (*Behavioral Health Information Notice (BHIN) 24-007, Effective Communication, Including Alternative Formats, for Individuals with Disabilities*)

Plan policy, *Glenn County Health and Human Services Agency (HHSA) Administration Manual, Auxiliary Aids and Services (revised 1/18/2018)* stated that the Plan will respond to an individual's linguistic needs for preferences with appropriate language services.

Plan policy *BH-1023, Alternate Formats: Information for Clients Who Are Visually and/or Hearing Impaired (revised 3/15/2019)* outlined the procedures for providing alternate formats of informing materials to meet the needs of visually impaired and/or hearing impaired upon request.

**Finding:** The Plan lacked procedures to ensure its disabled, blind, or visually impaired members are provided requested alternative format(s) of communication materials, such as braille or data CD.

Although Plan policy *HHSA* indicated the Plan's responsibility to respond to an individual's linguistic needs for preferences with appropriate language services, it did not include a process to provide the braille format to members who requested it.

Plan policy *BH-1023* outlined the procedure to provide alternative formats when requested; however, the policy does not include the procedure to provide information in braille or data CD.

The Plan explained in an interview that it communicated with other counties to collaborate and develop resources to meet the requirements for alternative formats. However, the Plan did not implement the new alternative communication

requirements due to financial barriers such as the high cost of contracting with a braille translator.

In an interview, The Plan stated that IDEA Solutions was a contractor who developed the audio CD for the Plan and that they may be able to do the data CD as well. The Plan was asked to provide the contract between the Plan and IDEA Solutions as follow up evidence however, the contract was not provided.

The Plan did not furnish documentation that demonstrates materials in braille or data CDs are available to members. In an interview, the Plan expressed they did not have the staffing, or financial resources needed to implement the items required in BHIN 24-007.

Failure to ensure members who are blind or visually impaired, and other individuals with disabilities are provided communication materials in all required standard alternative formats, specifically, data CDs and braille, can result in members not having adequate knowledge about treatment services provided.

**Recommendation:** The Plan shall revise subcontracts, implement policies and procedures, and monitor subcontracted providers to ensure members who are blind or visually impaired, and other individuals with disabilities are provided communication materials in all required standard alternative formats, specifically, data CD and braille.