



State of California—Health and Human Services Agency
Department of Health Care Services



MICHELLE BAASS
DIRECTOR

GAVIN NEWSOM
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January 20, 2023

Sent via e-mail to: mcranfill@amadorgov.org

Melissa Cranfill, Behavioral Health Director
Amador County Behavioral Health
10877 Conductor Blvd., Suite 300
Sutter Creek, CA 95685

SUBJECT: Annual DMC County Compliance Section Findings Report

Dear Director Cranfill:

The Department of Health Care Services (DHCS) is responsible for monitoring compliance to requirements of the Drug Medi-Cal (DMC) Contract operated by Amador County.

The County Compliance Section (CCS) within the Audits and Investigations Division (A&I) of DHCS conducted a review of the County's compliance with contract requirements based on responses to the monitoring protocol, discussion with county staff, and supporting documentation provided by the County.

Enclosed are the results of Amador County's Fiscal Year (FY) 2022-23 DMC contract compliance review. The report identifies deficiencies, required corrective actions, advisory recommendations, and referrals for technical assistance.

Amador County is required to submit a Corrective Action Plan (CAP) addressing each deficiency noted to the Medi-Cal Behavioral Health Division (MCBHD), Plan and Network Monitoring Branch (PNMB), County/Provider Operations and Monitoring Branch (CPOMB) liaison by 3/20/2023. Please use the enclosed CAP form and submit the completed CAP and supporting documentation via the MOVEit Secure Managed File Transfer System. For instructions on how to submit to the correct MOVEit folder, email MCBHDmonitoring@dhcs.ca.gov.

If you have any questions related to this report, please contact me at becky.counter@dhcs.ca.gov.

Sincerely,

Becky Counter
(916) 713-8567

Audits and Investigations
Contract and Enrollment Division
Behavioral Health Review Branch
County Compliance Section
1500 Capitol Ave., MS 2305
Sacramento, CA 95814
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Distribution:

To: Director Cranfill,

CC: Mateo Hernandez, Audits and Investigations, Contract and Enrollment Review Division Chief
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Ayesha Smith, Audits and Investigations, County Compliance Section Chief
Michael Bivians, Audits and Investigations, County Compliance Monitoring II Chief
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MCBHDMonitoring@dhcs.ca.gov, County/Provider Operations and Monitoring Branch
Amy Hixson, Amador County Behavioral Health Care Program Manager

COUNTY REVIEW INFORMATION

County:

Amador

County Contact Name/Title:

Amy Hixson/Health Care Program Manager

County Address:

108977 Conductor Blvd., Suite 300, Sutter Creek, CA 95685

County Phone Number/Email:

(209) 223-6548

ahixson@amadorgov.org

Date of Review:

12/19/2022

Lead CCS Analyst:

Becky Counter

Assisting CCS Analyst:

N/A

Report Prepared by:

Becky Counter

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) 2021-22 State-County Contract, herein referred to as State County Contract
 - b. Fiscal Year (FY) 2022-23 State-County Contract, herein referred to as State County Contract
 - c. Mental Health and Substance Use Disorders Services (MHSUDS) Information Notices
 - d. Behavioral Health Information Notices (BHIN)

ENTRANCE AND EXIT CONFERENCE SUMMARIES

Entrance Conference:

An Entrance Conference was conducted via WebEx on 12/19/2022. The following individuals were present:

- Representing DHCS:
Becky Counter, Associate Governmental Program Analyst (AGPA)
Todd Borchert, AGPA
- Representing Amador County:
Melissa Cranfill, Behavioral Health Director
Amy Hixson, Health Care Program Manager
Karen Vaughn, Deputy Director/ Fiscal & Administration
Angie Grau, Compliance Officer
Megan Hodson, Utilization Review/ Quality Improvement Coordinator
Stephanie Hess, MHSAs Coordinator

During the Entrance Conference, the following topics were discussed:

- Introductions
- Overview of review process
- Amador County overview of services provided

Exit Conference:

An Exit Conference was conducted via WebEx on 12/19/2022. The following individuals were present:

- Representing DHCS:
Becky Counter, AGPA
Todd Borchert, AGPA
- Representing Amador County:
Melissa Cranfill, Behavioral Health Director
Amy Hixson, Health Care Program Manager
Karen Vaughn, Deputy Director/ Fiscal & Administration
Angie Grau, Compliance Officer
Megan Hodson, Utilization Review/ Quality Improvement Coordinator
Stephanie Hess, MHSAs Coordinator

During the Exit Conference, the following topics were discussed:

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

SUMMARY OF FY 2022-23 COMPLIANCE DEFICIENCIES (CD)

<u>Section</u>	<u>Number of CD's</u>
1.0 Administration	1
2.0 Program Integrity	0
3.0 Perinatal Practice Guidelines	1
4.0 Youth Services	0
5.0 Reporting Requirements	0

CORRECTIVE ACTION PLAN (CAP)

Pursuant to the State County Contract, Exhibit A, Attachment I A1, Part I, Section 4, B, 6 a-b each CD identified must be addressed via a CAP. The CAP is due within sixty (60) calendar days of the date of this monitoring report.

Please provide the following within the completed FY 2022-23 CAP:

- a) A statement of the CD.
- b) A list of action steps to be taken to correct the CD.
- c) A date of completion for each CD.
- d) The name of the person who will be responsible for corrections and ongoing compliance.

The CPOMB analyst will monitor progress of the CAP completion.

Category 1: ADMINISTRATION

A review of the County's Administration was conducted to ensure compliance with applicable regulations and standards. The following deficiency in regulations, standards, or protocol requirement was identified:

COMPLIANCE DEFICIENCY:

CD 1.5:

DMC Contract, Exhibit A, Attachment I A1, Part I, Section 1

Title 22 Section 51341.1 (h)(6)(B)(i)(a-d)

(B) The provider shall complete a discharge summary, for any beneficiary with whom the provider lost contact, in accordance with all of the following requirements:

- (i) For outpatient drug free, day care habilitative, perinatal residential, and Naltrexone treatment services, the provider shall complete the discharge summary within thirty (30) calendar days of the date of the provider's last face-to-face treatment contact with the beneficiary. The discharge summary shall include all of the following:
 - (a) The duration of the beneficiary's treatment as determined by the dates of admission to and discharge from treatment.
 - (b) The reason for discharge.
 - (c) A narrative summary of the treatment episode.
 - (d) The beneficiary's prognosis.

Findings: The County did not provide evidence of compliance demonstrating it meets discharge summary requirements for beneficiaries enrolled in outpatient drug free, day care habilitative, perinatal residential, and Naltrexone treatment services with whom the provider lost contact. Specifically, the evidence does not include the following requirement:

- 30-day timeline (completed within 30 days of the date of the provider's last face-to-face treatment contact with the beneficiary).

Category 3: PERINATAL PRACTICE GUIDELINES

A review of the County's Perinatal Practice Guidelines was conducted to ensure compliance with applicable regulations, and standards. The following DMC deficiency in regulations, standards, or protocol requirement was identified:

COMPLIANCE DEFICIENCY:

CD 3.3:

DMC Contract, Exhibit A, Attachment I A1, Part II, I

I. Perinatal Practice Guidelines

The Contractor will follow the guidelines in Document 1G, "Perinatal Practice Guidelines," in developing and implementing perinatal treatment and recovery programs funded under this Exhibit, until new Perinatal Practice Guidelines are established and adopted. No formal amendment of this Contract is required for new guidelines to be incorporated into this Contract.

DMC Contract, Exhibit A, Attachment I A1, Part II, Q

Q. Subcontract Provisions

The Contractor shall include the foregoing Part II general provisions in all of its subcontracts.

Findings: The County did not provide evidence demonstrating that all of the foregoing State County Contract Exhibit A, Attachment I, Part II general provisions are included in all executed subcontracts, including the Perinatal Practice Guidelines provision.

TECHNICAL ASSISTANCE

Amador County did not request Technical Assistance in FY 22-23.