



BRADLEY P. GILBERT
DIRECTOR

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



GAVIN NEWSOM
GOVERNOR

March 9, 2020

Sent via e-mail to: CCondon@marincounty.org

Catherine Condon, Administrator
Marin County Behavioral Health and Recovery Services
20 North San Pedro Road
San Rafael, CA 94903

SUBJECT: Annual County Compliance Unit Report

Dear Administrator Condon:

The Department of Health Care Services (DHCS) is responsible for monitoring compliance to requirements of the Substance Abuse Block Grant (SABG) and the terms of the Contract operated by Marin County.

The County Compliance Unit (CCU) 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 instrument, discussion with county staff, and supporting documentation provided by the County.

Enclosed are the results of Marin County's State Fiscal Year 2019-20 SABG compliance review. The report identifies deficiencies, required corrective actions, advisory recommendations, and referrals for technical assistance.

Marin County is required to submit a Corrective Action Plan (CAP) addressing each deficiency noted to the Community Services Division (CSD), Community Support Branch (CSB), Policy, Monitoring and Financing Section (PMFS) Analyst by 4/8/2020. Please use enclosed CAP plan form when completing the CAP. CAP and supporting documentation to be e-mailed to the PMFS analyst at SABGcompliance@dhcs.ca.gov.

If you have any questions regarding this report, please contact me.

Sincerely,

Mayumi Hata

Mayumi Hata
(916) 713-8797
mayumi.hata@dhcs.ca.gov

Audits and Investigations Division
Medical Review Branch
Behavioral Health Compliance Section
County Compliance Unit
1500 Capitol Ave., MS 2305
Sacramento, CA 95814
<http://www.dhcs.ca.gov>

Distribution:

To: Administrator Catherine Condon

CC: Mateo Hernandez, Audits and Investigations, Medical Review Branch Acting Chief
Lanette Castleman, Audit and Investigation, Behavioral Health Compliance Section Chief
Mayumi Hata, Audit and Investigation, County Compliance Unit Chief
Janet Rudnick, Audit and Investigation, Provider Compliance Unit Chief
Tracie Walker, Community Services Division, Community Support Branch Chief
Donna Ures, Community Services Division, Policy, Monitoring and Financing Section Chief
Denise Galvez, Community Services Division, Youth Services Section Chief
SABGcompliance@dhcs.ca.gov, Policy, Monitoring and Financing Section
MCBHDMonitoring@dhcs.ca.gov, County and Provider Monitoring Unit

Lead CCU Analyst: Jessica Jenkins, AGPA Mayumi Hata, SSM II	Date of Review: 2/25/2020 - 2/26/2020
County: Marin County	County Address: 20 North San Pedro Road, San Rafael, CA 94903
County Contact Name/Title: Catherine Condon, Administrator	County Phone Number/Email: 415-473-4218 CCondon@marincounty.org
Report Prepared by: Mayumi Hata	Report Approved by: Mayumi Hata

REVIEW SCOPE

- I. Regulations:
 - a. California Code of Regulations, Title 22, section 51341.1 – Drug Medi-Cal Substance Use Disorder Services
 - b. Code of Federal Regulations; Title 45, Part 96; Subpart L; section 96.121 through 96.137: Substance Abuse Prevention and Treatment Block Grant
 - c. United States Code, Title 42, Section 300x-21 through 300x-66: Block Grants regarding Mental Health and Substance Use
 - d. Health and Safety Code, Division 10.5, Section 11750 – 11970: Alcohol and Drug Programs

- II. Program Requirements:
 - a. State Fiscal Year (SFY) 2019-20 State County Contract, herein referred to as State County Contract
 - b. State of California *Youth Treatment Guidelines Revised August 2002*
 - c. DHCS *Perinatal Practice Guidelines FY 2018-19*
 - d. National Culturally and Linguistically Appropriate Services (CLAS)
 - e. Mental Health and Substance Use Disorders Services (MHSUDS) Information Notices

ENTRANCE AND EXIT CONFERENCE SUMMARIES

Entrance Conference:

An entrance conference was conducted at 20 North San Pedro Road, San Rafael, CA 94903 on 2/25/2020. The following individuals were present:

- Representing DHCS:
Mayumi Hata, SSM II
- Representing Marin County:
Catherine Condon, County AOD Administrator
Jorge Flores, Senior Program Coordinator
Jordan Hall, Program Manager
Cody Milner, Senior Program Coordinator
Leigh Steffy, Department Analyst II
Cynthia Nisbet, Admin Services Tech
Gustavo Goncalves, Senior Program Coordinator
David Rothery, Compliance and Privacy Officer, HHS Admin
John Bhambra, BHRS Compliance Officer, HHS Information Security Officer

During the Entrance Conference the following topics were discussed:

- Introduction
- DHCS Re-Organization
- Medi-Cal Healthier California for All Proposal
- Overview of the Monitoring Process
- County of Marin Overview of Services

Exit Conference:

An exit conference was conducted at 20 North San Pedro Road, San Rafael, CA 94903 on 2/26/2020. The following individuals were present:

- Representing DHCS:
Mayumi Hata, SSM II
- Representing Marin County:
Catherine Condon, County AOD Administrator
Jorge Flores, Senior Program Coordinator
Jordan Hall, Program Manager
Cody Milner, Senior Program Coordinator
Leigh Steffy, Department Analyst II
Cynthia Nisbet, Admin Services Tech
Gustavo Goncalves, Senior Program Coordinator
David Rothery, Compliance and Privacy Officer, HHS Admin
John Bhambra, BHRS Compliance Officer, HHS Information Security Officer

During the Exit Conference the following topics were discussed:

- Summary of the annual review

SUMMARY OF SFY 2019-20 COMPLIANCE DEFICIENCIES (CD)

Section:	Number of CD's:
1.0 Administration	0
2.0 SABG Monitoring	0
3.0 Perinatal	0
4.0 Adolescent/Youth Treatment	1
5.0 Primary Prevention	0
6.0 Cultural Competence	0
7.0 CalOMS and DATAR	0
8.0 Privacy and Information Security	0
9.0 Fiscal	0
10.0 Previous CAP	0

CORRECTIVE ACTION PLAN

Pursuant to the State County Contract, Exhibit A, Attachment I A2, Part I, Section 3, B, 5-8 each compliance deficiency (CD) identified must be addressed via a Corrective Action Plan (CAP). The CAP is due within thirty (30) calendar days of the date of this monitoring report.

Please provide the following within the completed SFY 2019-20 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 PMFS analyst will monitor progress of the CAP completion.

4.0 ADOLESCENT/YOUTH TREATMENT (AYT)

The following deficiency in Adolescent/Youth Treatment regulations, standards, or protocol requirements was identified:

COMPLIANCE DEFICIENCY:

CD 4.23:

State County Contract, Exhibit A, Attachment I A2, Part II, Q

Q. Youth Treatment Guidelines

Contractor must comply with the guidelines in Document 1V, incorporated by this reference, "Youth Treatment Guidelines," in developing and implementing youth treatment programs funded under this Exhibit, until new Youth Treatment Guidelines are established and adopted. No formal amendment of this contract is required for new guidelines to be incorporated into this Contract.

Youth Treatment Guidelines Section VI, A, 1, a-e

A. Case Management and Complementary Services

Except for early intervention programs, programs should provide or arrange for case management services for every youth in treatment. If the case manager function is provided directly by the treatment program, the case manager should:

1. Have training and skills in the following areas:
 - a. AOD treatment, an understanding of addiction, and the intergenerational nature of AOD abuse;
 - b. familiarity with community resources and other youth service systems (education, child welfare, juvenile justice, mental health, etc.);
 - c. physical and sexual abuse;
 - d. family dynamics; and,
 - e. legal issues (informed consent for minors, disclosure of confidential information, child abuse/neglect reporting requirements, and duty-to-warn issues).

Finding: The County did not demonstrate tracking mechanisms to ensure the Case Managers possess the required training and skills to provide youth treatment.

TECHNICAL ASSISTANCE

DHCS's County Compliance Unit Analyst will make referrals to the DHCS County Liaison for the training and/or technical assistance areas identified below.

Other Topic: IN 20-001 Implementation of Assembly Bill (AB) 919