



BRADLEY P. GILBERT  
DIRECTOR

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



GAVIN NEWSOM  
GOVERNOR

March 19, 2020

Sent via e-mail to: [sdockery@stanbhhs.org](mailto:sdockery@stanbhhs.org)

Director Cherie Dockery  
Stanislaus County Behavioral Health and Recovery Services  
800 Scenic Dr.  
Modesto, CA 95350

SUBJECT: Annual County Compliance Unit Report

Dear Director Dockery:

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

Stanislaus 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 4/20/2020. 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](mailto:SABGcompliance@dhcs.ca.gov).

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

Sincerely,

Emanuel Hernandez  
(916) 713-8667  
[emanuel.hernandez@dhcs.ca.gov](mailto:emanuel.hernandez@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: Director Dockery

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  
Katrina Cox, Community Services Division, Prevention Services Section 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](mailto:SABGcompliance@dhcs.ca.gov), Policy, Monitoring and Financing Section  
[MCBHDMonitoring@dhcs.ca.gov](mailto:MCBHDMonitoring@dhcs.ca.gov), County and Provider Monitoring Unit  
Dawn Vercelli, BHRS Chief Substance Abuse Use Disorder Services  
Ruben Imperial, Behavioral Health Interim Director  
Kara Anguiano, Chief Fiscal Officer  
Nasrin Safi, BHRS Quality Services, Risk and Compliance

County Compliance Report  
Stanislaus

Lead CCU Analyst: Michael Bivians	Date of Review: 2/26/2020 – 02/27/2020
Assisting CCU Analyst: Emanuel Hernandez	
County: Stanislaus County Behavioral Health and Recovery Services (BHRS)	County Address: 800 Scenic Dr., Modesto, CA 95350
County Contact Name/Title: Nasrin Safi, LMFT, Quality Services, Risk, and Compliance Manager	County Phone Number/Email: 209-525-6265 nsafi@stanbhhs.org
Report Prepared by: Emanuel Hernandez	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 800 Scenic Dr., Modesto, CA 95350 on 2/26/2020. The following individuals were present:

- Representing DHCS:  
Michael Bivians, Associate Governmental Program Analyst (AGPA)  
Emanuel Hernandez, Associate Governmental Program Analyst (AGPA)
  
- Representing Stanislaus County:  
Dawn Vercelli, Stanislaus County Chief of Substance Use Disorder Services  
Nasrin Safi, Stanislaus County Quality Services, Risk Management, and Managed Care Plans  
Cameo Culcasi, Stanislaus County Substance Abuse Disorder Manager  
Debra Buckles, Stanislaus County Chief, Forensic Services Public Guardian  
Kara Anguiano, Stanislaus County Chief Fiscal Manager  
Charles Yarnell, Stanislaus County Recovery Center Outpatient Programs  
Monica Salazar, Stanislaus County Chief, Managed Care, Quality, Risk and Compliance  
Kristen Jasek-Rysdahi, Stanislaus County Performance Measurement, Manager  
Tabatha Spragne, Stanislaus County Behavioral Health Coordinator  
Jennifer Marsh, Stanislaus County SUD Education and Prevention  
Marycruz Vargas, Stanislaus County Qualifications Specialist  
Maria Rameno, Stanislaus County Qualifications Specialist  
Stephanie Gilden, Stanislaus County Behavioral Health and Recovery Services Accounts  
Melissa Hale, Stanislaus County Co-Occurring Disorders  
Cherie Dockery, Stanislaus County Associate Director  
Delayne Olivia, Stanislaus County Contract Administrator  
Tina Jamison, Stanislaus County Business Office Manager  
Rosa Gandarilla, Stanislaus County Coordinator  
Megan Vylonis, Stanislaus County Qualification Specialist  
Christi Golden, Stanislaus County Human Resources Director  
Francine Gutierrez, Stanislaus County Fiscal Manager  
Elizabeth Pike, Stanislaus County Withdrawal and Residential treatment  
Laura Garcia, Stanislaus County Human Resources Manager  
Renee Dicker, Last Resort Program Director  
Steve Collins, Center for Human Services Manager  
Jeff Mason, Center for Human Services Coordinator  
Stacey Glover, First Step Program Manager  
Diane Rose, First Step Program Manager

During the Entrance Conference the following topics were discussed:

- Introductions
- DHCS Re-Organization.
- Overview of Monitoring Process
- Overview of the County's System of Service

Exit Conference:

An exit conference was conducted at 800 Scenic Dr., Modesto, CA 95350 on 2/27/2020. The following individuals were present:

- Representing DHCS:  
Michael Bivians, AGPA  
Emanuel Hernandez, AGPA
  
- Representing Stanislaus County:  
Dawn Vercelli, Stanislaus County Chief of Substance Abuse Disorders  
Nasrin Safi, Stanislaus County Quality Services, Risk and Compliance  
Cameo Culcasi, Stanislaus County Manager II, Substance Abuse Disorders  
Bernardo Mora, Stanislaus County Medical Director  
Debra Buckles, Stanislaus County Chief Forensics Services  
Michael Levy, Stanislaus County Chief, Data Outcomes Technology Services  
Kristen Jasek-Rysdahi, Stanislaus County Performance Measurement, DOTS Manager  
Monica Salazar, Stanislaus County Chief, Managed Care, Quality, Risk and Compliance  
Tina Jamison, Stanislaus County Business Office Manager  
Jeff Sabeau, Stanislaus County Site Administrator  
Delayne Olivia, Stanislaus County Contract Administrator  
Stephanie Giden, Stanislaus County Behavioral Health and Recovery Services Accounts  
Tabatha Spragne, Stanislaus County Behavioral Health Coordinator  
Charles Yarell, Stanislaus County Staff Services Coordinator  
Maricruz Vargas, Stanislaus County Qualifications Specialist  
Maria Rameno, Stanislaus County Qualifications Specialist  
Cam Quach, Stanislaus County Staff Services Analyst  
Jeff Mason, Center for Human Services Coordinator  
Steve Collins, Center for Human Services BH Manager  
Diane Rose, First Step Program Manager  
Stacey Glover, First Step Program  
Renee Dicker, Last Resort Program Director  
David Lyon, Nirvana Drug and Alcohol Executive Director

During the Exit Conference the following topics were discussed:

- Review of Compliance Deficiencies
- Questions Regarding the Review Process
- Follow-Up Submissions Deadlines

**SUMMARY OF SFY 2019-20 COMPLIANCE DEFICIENCIES (CD)**

<b>Section:</b>	<b>Number of CD's:</b>
<b>1.0 Administration</b>	<b>0</b>
<b>2.0 SABG Monitoring</b>	<b>2</b>
<b>3.0 Perinatal</b>	<b>0</b>
<b>4.0 Adolescent/Youth Treatment</b>	<b>0</b>
<b>5.0 Primary Prevention</b>	<b>0</b>
<b>6.0 Cultural Competence</b>	<b>0</b>
<b>7.0 CalOMS and DATAR</b>	<b>1</b>
<b>8.0 Privacy and Information Security</b>	<b>0</b>
<b>9.0 Fiscal</b>	<b>0</b>
<b>10.0 Previous CAP</b>	<b>1</b>

## 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.



## 2.0 SABG MONITORING

The following deficiencies in the SABG monitoring requirements were identified:

### COMPLIANCE DEFICIENCIES:

#### **CD 2.12:**

SABG State-County Contract Exhibit A, Attachment I A2, Part I, Section 3, A, 1, e

1. Contractor's performance under this Exhibit A, Attachment I, Part I, shall be monitored by DHCS during the term of this Contract.
  - e. Whether the Contractor conducted annual onsite monitoring reviews of services and subcontracted services for programmatic and fiscal requirements. Contractor shall submit copy of its monitoring and audit reports to DHCS within two weeks of issuance. Reports shall be sent by secure, encrypted email to:

SUDCountyReports@dhcs.ca.gov or

Substance Use Disorder-Program, Policy, and Fiscal Division  
Performance Management Branch  
Department of Health Care Services  
PO Box 997413, MS-2627  
Sacramento, CA 95899-7413

**Finding:** The County did not monitor all providers for SABG programmatic and fiscal requirements for SFY 2018-19. The County did monitor 7 of 12 County and sub-contracted providers for SABG programmatic and fiscal requirements.

The County did submit 7 of 7 SABG programmatic monitoring reports secure and encrypted.

The County did submit 7 of 7 SABG programmatic and fiscal monitoring reports to DHCS within two weeks of report issuance.

The County did submit 3 SABG fiscal only monitoring reports to DHCS more than two weeks after report issuance. The County did not submit 2 fiscal only monitoring reports seven weeks after report issuance and 1 fiscal only monitoring report 10 weeks after report issuance.

**CD 2.13:**

SABG State-County Contract Exhibit A, Attachment I A2, Part I, Section 3, A, 1, e

1. Contractor's performance under this Exhibit A, Attachment I, Part I, shall be monitored by DHCS during the term of this Contract.
  - e. Whether the Contractor conducted annual onsite monitoring reviews of services and subcontracted services for programmatic and fiscal requirements. Contractor shall submit copy of its monitoring and audit reports to DHCS within two weeks of issuance. Reports shall be sent by secure, encrypted email to:

SUDCountyReports@dhcs.ca.gov or

Substance Use Disorder-Program, Policy, and Fiscal Division  
Performance Management Branch  
Department of Health Care Services  
PO Box 997413, MS-2627  
Sacramento, CA 95899-7413

**Finding:** The County did not monitor of 7 listed providers for SABG programmatic and fiscal requirements on the Out of County Referral (OOCR) Log.

**7.0 CALIFORNIA OUTCOMES MEASUREMENT SYSTEM TREATMENT (CalOMS Tx)  
AND DRUG AND ALCOHOL TREATMENT ACCESS REPORT (DATAR)**

The following deficiency in CalOMS and DATAR regulations, standards, or protocol requirements was identified:

COMPLIANCE DEFICIENCY:

**CD 7.34.b:**

State-County Contract, Exhibit A, Attachment I A2, Part III, B, 3-6

3. 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.
4. 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.
5. 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.
6. 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.

State-County Contract, Exhibit A, Attachment I A2, Part III, E, 3

3. The Contractor shall ensure that all DATAR reports are submitted by either Contractor-operated treatment services and by each subcontracted treatment provider to DHCS by the 10<sup>th</sup> of the month following the report activity month.

**Finding:** The County’s Open Admission report was not current.

## 10.0 PREVIOUS CAP(s)

During the SFY 2019-20 review, the following CAP and CD were discussed and are still outstanding.

### CD 10.39:

SABG State-County Contract, Exhibit A, Attachment I A2, Part I, Section 3, B, 8

8. If the Contractor does not submit a CAP, or, does not implement the approved CAP provisions within the designated timeline, then DHCS may withhold funds until the Contractor is in compliance. DHCS shall inform the Contractor when funds will be withheld.

SABG State-County Contract, Exhibit A, Attachment I A2, Part I, Section 1, B, 3, b

3. As a subrecipient, the Contractor shall:
  - b. Comply with federal statutes, regulations, including 45 CFR Part 75, and terms and conditions of the SABG grant.

45 CFR 75.514(e)

Audit follow-up.

- (e) The auditor must follow-up on prior audit findings, perform procedures to assess the reasonableness of the summary schedule of prior audit findings prepared by the auditee in accordance with § 75.511(b), and report, as a current year audit finding, when the auditor concludes that the summary schedule of prior audit findings materially misrepresents the status of any prior audit finding. The auditor must perform audit follow-up procedures regardless of whether a prior audit finding relates to a major program in the current year.

**Finding:** The County did not demonstrate compliance with requirements to implement the approved CAP deficiency provision in a timely manner. The CAP is SFY 2018-19, 7.34.b Open Admissions Report.

**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.

Stanislaus County did not request Technical Assistance for this Fiscal Year 2019-20 review.