



MICHELLE BAASS
DIRECTOR

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



GAVIN NEWSOM
GOVERNOR

April 6, 2022

Sent via e-mail to: letyplancarte@co.imperial.ca.us

Leticia Plancarte-Garcia
Imperial County Behavioral Health Director
202 North 8th Street
El Centro, CA 92243

SUBJECT: Annual SABG County Compliance Unit Findings Report

Dear Director Plancarte-Garcia

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 Imperial 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 Imperial County's Fiscal Year 2021-22 SABG compliance review. The report identifies deficiencies, required corrective actions, advisory recommendations, and referrals for technical assistance.

Imperial 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 6/06/2022. Please use enclosed CAP form and submit the completed CAP and supporting documentation by email to the PMFS analyst at SABGcompliance@dhcs.ca.gov.

If you have any questions, please contact me at emanuel.hernandez@dhcs.ca.gov.

Sincerely,

Emanuel Hernandez
(916) 713-8667

Audits and Investigations Division
Medical Review Branch
Behavioral Health Compliance Section
County Compliance Unit
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COUNTY REVIEW INFORMATION

County:

Imperial

County Contact Name/Title:

Sarah Moore, Imperial County Behavioral Health Manager

County Address:

202 N Eighth St
El Centro, CA 92243

County Phone Number/Email:

422-265-1560

SarahMoore@co.imperial.ca.us

Date of Review:

2/9/2022

Lead CCU Analyst:

Emanuel Hernandez

Assisting CCU Analyst:

N/A

Report Prepared by:

Emanuel Hernandez

Report Approved by:

Ayesha Smith

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. Fiscal Year (FY) 2020-21 Substance Abuse Block Grant (SABG) Application, herein referred to as the SABG Application
 - b. Fiscal Year (FY) 2021-22 Substance Abuse Block Grant (SABG) Application, herein referred to as the SABG Application
 - c. State of California *Youth Treatment Guidelines Revised August 2002*
 - d. DHCS *Perinatal Practice Guidelines FY 2018-19*
 - 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 WebEx on 2/9/2022. The following individuals were present:

- Representing DHCS:
Emanuel Hernandez, Associate Governmental Program Analyst (AGPA)
Ana Lopez, Associate Governmental Program Analyst (AGPA)
- Representing Imperial County:
Jessica Perea, Imperial County Behavioral Health Administrative Analyst
Gabriela Izaguirre, Imperial County Behavioral Health Administrative Analyst
Ana Contreras, Imperial County Behavioral Health Manager
Victoria Mansfield, Imperial County Behavioral Health Manager
Sara Moore, Imperial County Behavioral Health Manager
Ryan Taylor, Imperial County Behavioral Health Administrative Analyst
Jonathan Garcia, Imperial County Behavioral Health Administrative Analyst
Nancy Del Real, Imperial County Behavioral Health Deputy Director
Adolfo Estrada, Imperial County Behavioral Health Manager

During the Entrance Conference, the following topics were discussed:

- Introductions
- Overview of the monitoring process
- Imperial county overview of services

Exit Conference:

An Exit Conference was conducted via WebEx on 2/9/2022. The following individuals were present:

- Representing DHCS:
Emanuel Hernandez, AGPA
Ana Lopez, AGPA
- Representing Imperial County:
Jessica Perea, Imperial County Behavioral Health Administrative Analyst
Gabriela Izaguirre, Imperial County Behavioral Health Administrative Analyst
Ana Contreras, Imperial County Behavioral Health Manager
Victoria Mansfield, Imperial County Behavioral Health Manager
Sara Moore, Imperial County Behavioral Health Manager
Ryan Taylor, Imperial County Behavioral Health Administrative Analyst
Jonathan Garcia, Imperial County Behavioral Health Administrative Analyst
Nancy Del Real, Imperial County Behavioral Health Deputy Director
Adolfo Estrada, Imperial County Behavioral Health Manager

During the Exit Conference, the following topics were discussed:

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

SUMMARY OF FY 2021-22 COMPLIANCE DEFICIENCIES (CD)

<u>Section</u>	<u>Number of CD's</u>
1.0 Administration	0
2.0 Prevention	0
3.0 Perinatal	0
4.0 Adolescent/Youth Treatment	0
5.0 Data/CalOMS	0
6.0 Program Integrity	2
7.0 Fiscal	0

CORRECTIVE ACTION PLAN (CAP)

Pursuant to the SABG County Application, Enclosure 2, Part I, Section 3, B, 5-7 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 2021-22 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.

Category 6: PROGRAM INTEGRITY

A review of the SABG monitoring, privacy, and program integrity was conducted to ensure compliance with applicable regulations and standards. The following deficiencies in regulations, standards or protocol requirements were identified:

COMPLIANCE DEFICIENCIES:

CD 6.1.2:

SABG Application Enclosure 2, I, 3, A, 1, e

1. County's performance under the County Performance Contract and the SABG County Application shall be monitored by DHCS during the term of the County Performance Contract. Monitoring criteria shall include, but not be limited to:
 - e. Whether the County conducted annual onsite monitoring reviews of services and subcontracted services for programmatic and fiscal requirements. County shall submit copy of its monitoring and audit reports to DHCS within two weeks of issuance. Reports shall be sent via a Secure Managed File Transfer system specified by DHCS.

Findings: The County monitored four (4) of four (4) SABG funded programs and submitted audit reports of these annual reviews to DHCS.

- The County submitted three (3) of four (4) annual monitoring reports within two weeks of completion to DHCS.

CD 6.2.1:

SABG Application Enclosure 2, II, 19, L

- L. Confidentiality of Alcohol and Drug Abuse Patient Records (42 CFR Part 2, Subparts A – E).

SABG Application, Enclosure 2, II, 23

23. Subcontract Provisions

County shall include all of the foregoing provisions in all of its subcontracts.

Findings: The County did not provide evidence demonstrating compliance with Confidentiality of Substance Use Disorder Patient Records under 42 CFR Part 2, Subparts A-E.

TECHNICAL ASSISTANCE

No technical assistance was requested by the County.