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DIRECTOR

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



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GOVERNOR

June 22, 2017

Sent via e-mail to: [judith.martin@sfdph.org](mailto:judith.martin@sfdph.org)

Judith Martin, MD, Deputy Medical Director of Community Behavioral Health Services  
San Francisco Department of Public Health  
Room 221, Second floor  
1380 Howard Street  
San Francisco, CA 94103

SUBJECT: State Fiscal Year (SFY) 2016-17 - County Monitoring Unit Report

Dear Deputy Medical Director Martin:

Enclosed are the results of San Francisco County's 2016-17 Substance Abuse Prevention and Treatment (SAPT) Block Grant (BG)<sup>1</sup>, and the State County Contract compliance review. The Department of Health Care Services (DHCS) is responsible for monitoring requirements of the SAPT BG and the terms of the State County Contract operated by San Francisco County.

The County Monitoring Unit (CMU) within the Performance Management Branch (PMB) of DHCS performed a comprehensive review based on responses to the monitoring instrument, discussion with county staff, supporting documentation and requirements. The enclosed report addresses and/or identifies compliance deficiencies, required corrective actions, advisory recommendations, and referral for technical assistance.

San Francisco County is required to submit a Corrective Action Plan (CAP) addressing each deficiency noted to the CMU Analyst by July 25, 2017. The CAP must follow the guidelines detailed within the attached report. Please reference the enclosed CAP instructions and e-mail the CAP to the CMU Analyst. Supporting CAP documentation may be e-mailed or mailed to the address listed below. If you have any questions regarding this report or need assistance, please contact the CMU analyst.

Sincerely,

Eric Painter  
CMU Analyst  
(916) 327-2619  
[Eric.Painter@dhcs.ca.gov](mailto:Eric.Painter@dhcs.ca.gov)

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<sup>1</sup> Title 45 Code of Federal Regulations, Part 96, Subpart L – Substance Abuse Prevention and Treatment Block Grant requirements



**County Monitoring Unit Report**  
San Francisco

Distribution:

To: Judith Martin, MD, Deputy Medical Director of Community Behavioral Health Services

CC: Victoria King-Watson, Substance Use Disorder Program, Policy and Fiscal Division, Assistant Division Chief  
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Tiffany Stover, Postservice Postpayment Unit I, Supervisor  
Janet Rudnick, Postservice Postpayment Unit II, Supervisor  
Trudi Romero, Policy and Prevention Branch, Office Technician

Date: June 22, 2017

Report Prepared by: *Eric Painter, County Monitoring Analyst*  
Manager Approval: *Susan Jones, County Monitoring Supervisor*

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**Lead CMU Analyst:**  
Eric Painter

**Review Date:** May 23-25, 2017

**Assisting CMU Analyst(s):**  
Becky Counter

**Review Period:** SFY 2016-17

**County:** San Francisco

**County Address:**  
1380 Howard Street  
San Francisco, CA 94103

The Department of Health Care Services (DHCS) is required to provide programmatic, administrative, and fiscal oversight of the statewide Substance Abuse Prevention and Treatment Block Grant (SAPT BG), the State County Contract, and Drug Medi-Cal (DMC) Substance Use Disorder (SUD) services through annual compliance reviews.

This report summarizes the findings of the compliance review conducted by the County Monitoring Unit (CMU).

## CORRECTIVE ACTION PLAN

Pursuant to the State County Contract, Exhibit A, Attachment I, Part V, Section 4, 7, (a-b) each deficiency 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. Advisory recommendations are not required to be addressed in the CAP.

The Corrective Action Plan shall:

1. Address each programmatic deficiency;
2. Provide a specific description of how the deficiency will be corrected;
3. Identify the staff person responsible for correcting the deficiency and ensuring future compliance;
4. Specify the target date for complete implementation of each deficiency; and
5. As deficiencies are corrected, include training documentation, revised policies/procedures, and other materials which demonstrate the correction of a deficiency, if applicable.

The CMU analyst will monitor progress of CAP implementation until complete.

## REVIEW SCOPE

- I. Regulations:
  - a. 22 CCR § 51341.1 – Drug Medi-Cal Substance Use Disorder Services
  - b. 9 CCR, Division 4, Chapter 4, Subchapter 1 – 6: Narcotic Treatment Programs
  - c. 45 CFR; Part 96; Subpart L; §96.121 through 96.137: Substance Abuse Prevention and Treatment Block Grant
  - d. 42 USC, Section 300x-21 through 300x-66: Substance Abuse Prevention and Treatment Block
  - e. HSC, Division 10.5, Section 11750 – 11970: State Department of Health Care
  
- II. Program Requirements:
  - a. State Fiscal Year (SFY) 14/15 - 16/17 State County Contract, herein referred to as State County Contract
  - b. State of California *Youth Treatment Guidelines Revised August 2002*
  - c. DHCS *Perinatal Services Network Guidelines FY 2016-17*
  - d. National Culturally and Linguistically Appropriate Services (CLAS)
  - e. Alcohol and Drug Program (ADP) Bulletins
  - f. Mental Health and Substance Use Disorders Services (MHSUDS) Information Notices

## 1.0 ADMINISTRATION

After review of the program's protocols, policies and procedures, there were no deficiencies in Administration.

## 2.0 SAPT BG MONITORING

After review of the program's protocols, policies and procedures, there were no deficiencies in SAPT BG Monitoring.

### **ADVISORY RECOMMENDATIONS:**

#### **AR 2.20:**

State County Contract Exhibit A, Attachment I A2, Part IV, Section 3, A, 1, (e)  
*Contractor shall conduct annual onsite monitoring reviews of services and subcontracted services for programmatic and fiscal requirements. Contractor shall submit copy of their monitoring and audit reports to DHCS within two weeks of issuance. Reports should be sent by secure, encrypted e-mail to:*  
[SUDCountyReports@dhcs.ca.gov](mailto:SUDCountyReports@dhcs.ca.gov); or  
*Substance Use Disorder - Prevention, Treatment and Recovery Services  
Division, Performance Management Branch, Department of Health Care Services  
PO Box 997413, MS-2627  
Sacramento, CA 95899-7413*

**Recommendation:** Provider shall consider including the funding source (SAPT and DMC) on the monitoring tools, and include in the monitoring reports.

### 3.0 DRUG MEDI-CAL

The following DMC deficiencies in regulations, standards, or protocol requirements were identified:

#### **COMPLIANCE DEFICIENCIES:**

##### **CD 3.30:**

State County Contract Exhibit A, Attachment I, Part V, Section 4, B, 4(a)

*(a) All complaints received by Contractor regarding a DMC certified facility shall be forwarded to:*

*Drug Medi-Cal Complaints are to be submitted to:*

*Department of Health Care Services*

*P.O. Box 997413*

*Sacramento, CA 95899-7413*

*Call the Hotline*

*Phone Toll-Free: (800) 822-6222*

**Finding:** The County did not provide the process for investigating complaints regarding a DMC certified facility.

##### **CD 3.31:**

State County Contract Exhibit A, Attachment I, Part V, Section 4, B, 4, (b)

*Counties shall be responsible for investigating complaints and providing the results of all investigations to the Department e-mail address by secure, encrypted e-mail to:*

*SUDCountyReports@dhcs.ca.gov within two (2) business days of completion.*

**Finding:** The County did not submit DMC complaints and results of the investigations to DHCS as indicated in the requirements above.



## 4.0 PERINATAL

After review of the program's protocols, policies and procedures, there were no deficiencies in Perinatal.

## 5.0 ADOLESCENT/YOUTH TREATMENT (AYT)

After review of the program's protocols, policies and procedures, there were no deficiencies in AYT.

## 6.0 FISCAL AUDITING

After review of the program's protocols, policies and procedures, there were no deficiencies in Fiscal Auditing.

### **ADVISORY RECCOMENDATIONS:**

#### **AR 6.47:**

State County Contract, Exhibit B, A3, Part I, Section 1, H, 3

*Pursuant to 45 CFR 96.124 C 1-3 the Contractor shall expend a specified percentage of SAPT Block Grant funds for perinatal services, pregnant women, and women with dependent children each state fiscal year (SFY). The Contractor shall expend that percentage of SAPT Block Grant funds by, either establishing new programs or expanding the capacity of existing programs. In accordance with 45 CFR 96.124 (c)(1-3), the Contractor shall calculate the percentage of funds to be expended for perinatal services, pregnant women, and women with dependent children in the manner described in Exhibit G: County Share of SAPT Block Grant Women Services Expenditure Requirement.*

**Recommendation:** Provider shall consider creating a written process for expending and reporting perinatal funds.

## 7.0 PRIMARY PREVENTION

After review of the program's protocols, policies and procedures, there were no deficiencies in Primary Prevention.

## 8.0 CULTURAL COMPETENCE

After review of the program's protocols, policies and procedures, there were no deficiencies in Cultural Competence.

## 9.0 ELECTRONIC HEALTH RECORDS (EHR)

After review of the program's protocols, policies and procedures, there were no deficiencies in EHR.

## 10.0 CALIFORNIA OUTCOMES MEASUREMENT SYSTEM TREATMENT (CalOMS Tx) AND DRUG AND ALCOHOL TREATMENT ACCESS REPORT (DATAR)

The following deficiencies in CalOMS and DATAR regulations, standards, or protocol requirements were identified:

### **COMPLIANCE DEFICIENCIES:**

#### **CD 10.57.d:**

State County Contract, Exhibit A, Attachment I, Part III, F, (3)

*Contractor shall comply with the treatment and prevention data quality standards established by the State. Failure to meet these standards on an ongoing basis may result in withholding non-DMC funds.*

**Finding:** The County's providers annual updates or client discharges, for beneficiaries in treatment over one year, were not submitted.

## 11.0 PRIVACY AND INFORMATION SECURITY

After review of the program's protocols, policies and procedures, there were no deficiencies in Privacy and Information Security.



## 12.0 TECHNICAL ASSISTANCE

The County did not request any technical assistance during the SFY 201617 site review.