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Substance Use Disorder Services Annual Monitoring

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Agenda

Introduction To SUDS Monitoring

Focus: DHCS Annual Monitoring

Monitoring Process

Review Categories

Recent Findings

Questions



Introduction to SUDS Monitoring

- The Department of Health Care Services (DHCS) Medi-Cal Behavioral Health Division and Audits and Investigations Division collaborate to ensure Drug Medi-Cal Organized Delivery System (DMC-ODS) counties are in compliant with:
 - Regulatory requirements
 - Contractual requirements
 - Obligations to beneficiaries



Introduction to SUDS Monitoring

- These requirements and obligations are outlined in the Agreements held between DHCS and County of El Dorado Behavioral Health that govern the provision of Substance Use Disorder Services (SUDS)
 - DMC – ODS Intergovernmental Agreement
 - Substance Abuse Prevention & Treatment Block Grant (SABG) Performance Agreement
 - Includes updates from new regulations and Behavioral Health Information Notices (BHINS)

Introduction to SUDS Monitoring

- Types of monitoring include:
 - DMC-ODS Annual On-Site or Virtual Monitoring
 - SABG Annual On-Site or Virtual Monitoring
 - Annual Network Adequacy Monitoring
 - External Quality Review
 - Ongoing Monitoring Activities (OMA)
 - DHCS determines need for OMA
 - Based on results of DMC-ODS Annual Monitoring, Complaints and/or Longstanding Unresolved Corrective Action Plans

Focus: DHCS Annual Monitoring

- Each year the SUDS Division participates in annual compliance monitoring performed by DHCS:
 - DMC-ODS Annual On-Site or Virtual Monitoring
 - SABG Annual On-Site or Virtual Monitoring
- Requirements for each agreement are monitored concurrently using two separate tools, one for DMC-ODS and one for SABG

Monitoring Process

DMC-ODS and SABG
follow the same process

- Six months in advance of monitoring
- DHCS provides notice to County of Intent to Monitor and schedules the monitoring dates

Monitoring Process

DMC-ODS and SABG
follow the same process

- Three months in advance of scheduled monitoring dates
- DHCS provides County with both the DMC-ODS Monitoring Tool and the SABG Monitoring Tool

Monitoring Process

DMC-ODS and SABG
follow the same process

- County is given 45 days to complete both monitoring tools and provide all requested backup documents back to DHCS

Review Categories

DMC-ODS Tool

- Availability of DMC-ODS Services
- Coordination of Care
- Quality Assurance and Performance Improvement
- Access and Information Requirements
- Beneficiary Rights and Protections
- Program Integrity

Review Categories

SABG Tool

- Administration
- Prevention
- Perinatal
- Adolescent/Youth Treatment
- Data/CalOMS
- Program Integrity
- Fiscal

Example of Monitoring Tool Question

Please respond:

a. Please describe how the Plan ensures compliance with identifying prohibited affiliations and not contracting with individuals or entities that are debarred, excluded or suspended.

Please provide:

b. ☐ Applicable policies and procedures.

c. ☐ All written disclosures notifying DHCS of identified prohibited affiliations discovered during FY 2021-22 with PHI and PII redacted.

Please provide evidence of practice:

d. ☐ Evidence of completed monitoring for (tracking) network providers for this requirement during FY 2021-22.

Recent Findings FY 2021 – 2022 Available Online

- <https://www.dhcs.ca.gov/Documents/El-Dorado-County-FY-2021-22-DMC-ODS-Findings-Report.pdf>
- https://www.dhcs.ca.gov/Documents/CSD_YV/SABG/SABG%2021-22/El-Dorado-County-FY-2021-22-SABG-Findings-Report.pdf

Recent Findings FY 2021 – 2022 DMC - ODS

County Compliance Report
El Dorado

SUMMARY OF FY 2021-22 COMPLIANCE DEFICIENCIES (CD)

<u>Section:</u>	<u>Number of CD's</u>
1.0 Availability of DMC-ODS Services	6
2.0 Coordination of Care	0
3.0 Quality Assurance and Performance Improvement	0
4.0 Access and Information Requirements	1
5.0 Beneficiary Rights and Protections	0
6.0 Program Integrity	2

Recent Findings FY 2021 – 2022 DMC-ODS

- Availability of DMC-ODS Services
 - Deficiencies related to documentation of required trainings as evidence of training for non-professional and professional staff
- Access and Information Requirements
 - Deficiency related to contract language – keep records for 10 years
- Program Integrity
 - Deficiency related to implementation of service verification process

Recent Findings FY 2021 – 2022 SABG

County Compliance Report
El Dorado

SUMMARY OF FY 2021-22 COMPLIANCE DEFICIENCIES (CD)

<u>Section</u>	<u>Number of CD's</u>
1.0 Administration	1
2.0 Prevention	0
3.0 Perinatal	0
4.0 Adolescent/Youth Treatment	1
5.0 Data/CalOMS	0
6.0 Program Integrity	1
7.0 Fiscal	0

Recent Findings FY 2021 – 2022 SABG

- Administration
 - Deficiency related to accuracy of the Out of County Referral Log which lists out of county contracted providers
- Adolescent/Youth Treatment
 - Deficiency related lack of written process for referral of youth to detoxification services
- Program Integrity
 - Deficiency related accuracy of records maintained by DHCS regarding the number of providers enrolled vs. number of annual monitoring reports submitted by county. DHCS error.

Current Standing of Deficiencies in DMC-ODS and SABG

- All previous fiscal year corrective action plans are resolved.
- Most recent monitoring occurred in June 2023 for FY 2022-2023.
- SUDS is awaiting results from DHCS

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QUESTIONS?