

Per California Code of Regulations, title 2, section 548.5, the following information will be posted to CalHR's Career Executive Assignment Action Proposals website for 30 calendar days when departments propose new CEA concepts or major revisions to existing CEA concepts. Presence of the department-submitted CEA Action Proposal information on CalHR's website does not indicate CalHR support for the proposal.

**A. GENERAL INFORMATION**

1. Date

8/14/2025

2. Department

California Correctional Health Care Services (CCHCS)

3. Organizational Placement (Division/Branch/Office Name)

Office of Communications/Special Projects/CalAIM Compliance and Oversight Unit

4. CEA Position Title

Associate Director, CalAIM Compliance and Oversight Unit

5. Summary of proposed position description and how it relates to the program's mission or purpose.  
(2-3 sentences)

The proposed Associate Director, California Advancing and Innovating Medi-Cal (CalAIM) Compliance and Oversight Unit within CCHCS will manage the statewide day-to-day operations related to the new CalAIM Justice Involved (JI) Reentry initiative which includes oversight and compliance from state and federal regulations tied to Medi-Cal and Medicaid. The CalAIM program will coordinate with all applicable programs and 58 county stakeholders to assist with coordinating business associate agreements/memorandums of understandings as required by the Department of Health Care Services (DHCS) and be under a high level of scrutiny at the state and federal level.

6. Reports to: (Class Title/Level)

Deputy Director, Integrated Substance Use Disorder Treatment (ISUDT) Program/CEA B

7. Relationship with Department Director (Select one)

- ☒ Member of department's Executive Management Team, and has frequent contact with director on a wide range of department-wide issues.
- ☐ Not a member of department's Executive Management Team but has frequent contact with the Executive Management Team on policy issues.

(Explain):

8. Organizational Level (Select one)

- ☐ 1st ☐ 2nd ☐ 3rd ☒ 4th ☐ 5th (mega departments only - 17,001+ allocated positions)

## **B. SUMMARY OF REQUEST**

### **9. What are the duties and responsibilities of the CEA position? Be specific and provide examples.**

Under the direction of the Deputy Director, ISUDT Program, the CEA A serves as the Associate Director for the CalAIM JI Reentry Initiative Compliance and Oversight Unit within CCHCS to manage the statewide CalAIM implementation and operations for compliance and reporting. The incumbent is responsible for leadership, compliance and operational support requiring a high level of knowledge, skill, and expertise to manage the CalAIM specialized workload impacting all institutions statewide. Travel to institutions and work activities outside normal working hours may be required due to operational needs.

The Associate Director, CalAIM Compliance and Oversight Unit develops statewide policy for the compliance and oversight program of the CalAIM JI Reentry Initiative which includes management and reporting compliance plans, processes, and schedules to adhere to statewide and federal policies, procedures, rules and regulations as mandated by Center of Medicare and Medicaid Services (CMS) and DHCS. Responsible for leadership, compliance, and operations support required to establish, expand, and operate the CalAIM Compliance and Oversight Unit. Implements change management plans to help program areas adopt new reporting and compliance systems, and process improvements. Leads program teams for California Department of Corrections and Rehabilitation (CDCR)/CCHCS including, but not limited to CalAIM impacts with Quality Management, Medical Services, Pharmacy, Mental Health, Nursing, and Division of Adult Parole Operations Transitional Case Management Program to fully operationalize the reporting and compliance for the CalAIM Initiative.

The Associate Director, CalAIM Compliance and Oversight Unit directly supervises staff supporting regional areas for statewide operations and claiming processes. Reviews, implements, and ensures conformance of CMS and DHCS policies and regulations. Identifies complex business problems, provides advice, and works with internal stakeholders (Deputy Directors, Associate Directors, Chief Nurse Executives, etc.) and external stakeholders (Department of Finance, Legislative Members, DHCS' Deputy Director) to draft program impact analysis and develop program solutions and alternatives. Advises internal and external stakeholders in interpreting and appropriately applying complex policies and best practices on programs to comply with state and federal mandates.

The Associate Director, CalAIM Compliance and Oversight Unit works across CDCR/CCHCS divisions and external stakeholders with multi-disciplinary teams to create and maintain a working environment that supports collaboration to achieve program goals. Coordinates with executive management (Deputy Directors, Associate Directors, etc.) from Information Technology, Legal, and the Privacy Office to develop and implement policies pertaining to the CalAIM initiative, data management and data sharing coordination processes. This includes developing and coordinating data sharing processes with external stakeholders, such as executive management at Managed Care Plans and County Behavioral Health Departments, and the DHCS Strategic Partnerships, as well as other state agencies, and probation, to support continuity of care post-release.

The Associate Director, CalAIM Compliance and Oversight Unit secures and manages vendor contracts to ensure schedule, budget, performance and products are consistent with contract deliverables. Creates program management artifacts, plans, and schedules such as tools and deliverables used throughout the reporting life cycle. Interfaces with program sponsors. Measures and evaluates program results according to established criteria. May review and provide first level approval on deliverables and invoices.

The Associate Director, CalAIM Compliance and Oversight Unit will perform other related duties as required.

**B. SUMMARY OF REQUEST (continued)**

10. How critical is the program's mission or purpose to the department's mission as a whole? Include a description of the degree to which the program is critical to the department's mission.

- ☒ Program is directly related to department's primary mission and is critical to achieving the department's goals.
- ☐ Program is indirectly related to department's primary mission.
- ☐ Program plays a supporting role in achieving department's mission (i.e., budget, personnel, other admin functions).

Description: The CalAIM Compliance and Oversight Unit is directly related to the CCHCS' primary mission and is critical to achieving its goals. The JI Reentry Initiative directly supports the CCHCS' mission to facilitate the successful reintegration of the incarcerated patients in our care back to their communities equipped with the tools to be drug-free, healthy, and employable members of society by ensuring continuity of health care coverage and services between the time they are incarcerated and when they are released. The JI Reentry Initiative facilitates the continuity of care from prison to the community by providing a direct link and warm hand-off to a managed care plan and/or to county behavioral health services. It also provides people who are reentering the community with the prescribed medications and durable medical equipment they need and access to programs and supportive services necessary for a successful transition into society.

Assembly Bill (AB) 133 was enacted in 2021. It established the CalAIM initiative to support the goals of identifying and managing the risk and needs of Medi-Cal beneficiaries, transitioning and transforming the Medi-Cal program to a more consistent and seamless system, and improving quality outcomes. One of the new and long-awaited components of CalAIM is the JI Reentry Initiative which mandates correctional facilities to develop and implement a process to coordinate with Medi-Cal Managed Care Plans and Medi-Cal Behavioral Health Delivery Systems to facilitate continued behavioral health treatment in the community for incarcerated patients. The JI Reentry Initiative allows eligible incarcerated patients in California to enroll in Medi-Cal and receive a targeted set of medical and social support services in the 90-days before their release.

**B. SUMMARY OF REQUEST (continued)**

11. Describe what has changed that makes this request necessary. Explain how the change justifies the current request. Be specific and provide examples.

CalAIM is a new requirement for the State of California. As required by AB 133, correctional facilities are required to provide Medi-Cal eligibility services to incarcerated patients 90-days prior to release. CCHCS is required to become a Medi-Cal provider, which requires being in compliance with state and federal Medi-Cal rules, regulations, and guidance standards set by the DHCS for participation in the Medi-Cal program. This includes proper enrollment, billing practices, and adherence to quality-of-care standards.

CDCR/CCHCS will be responsible for following state and federal statutes and regulations, including Welfare and Institutions Code, California Code of Regulations, Patient Protection and Affordable Care Act, and Code of Federal Regulations. The statutes and regulations are binding for Medi-Cal providers, their designated agents, all public and private agencies and/or individuals that are engaged in planning, providing or securing Medi-Cal services for or on behalf of recipients/applicants. Failure to comply can result in penalties, including termination of provider status or suspension from the Medi-Cal program, financial penalties, such as a loss of reimbursement of federal funding or legal action.

CDCR eligible incarcerated patients are entitled to receive CalAIM benefits. The establishment of this position will ensure compliance with AB 133 and allow CCHCS to avoid litigation.

### C. ROLE IN POLICY INFLUENCE

12. Provide 3-5 specific examples of policy areas over which the CEA position will be the principle policy maker. Each example should cite a policy that would have an identifiable impact. Include a description of the statewide impact of the assigned program.

The Associate Director will be responsible for the recommendation, distribution, and implementation of policies relative to the CCHCS' CalAIM JI reentry initiative. The incumbent will advise the Deputy Director, ISUDT Program and other executive management on the formulation and evaluation of the policy matters for the various special projects program areas. The policy decisions made by the incumbent will directly impact staff within the Compliance and Oversight Unit, internal and external stakeholders, and the Department (CCHCS).

Each of the examples below highlight compliance, reporting, and monitoring systems/reports/areas that require ongoing strategic direction, policy direction, and management oversight to measure and facilitate CCHCS' compliance with health care related to state and federal court mandates. The Associate Director will uphold data integrity and ensure staff are continuously trained, informed, and capable of facilitating compliance on the latest state and federal health care mandates.

1) Medi-Cal Compliance Program: providers are required to implement compliance programs to ensure adherence to state and federal regulations, while ensuring its effectiveness. These programs help prevent fraud, waste, and abuse within the Medi-Cal system and allow for maximum reimbursement to the State's General Fund. The incumbent is needed to work with cross-divisional teams to identify policies, operational practices, and process improvements needed to ensure the provision of services and reimbursement to CCHCS. Key components include written policies and procedures, designated compliance officer(s), training, communication, monitoring, and auditing. This is a critical role responsible for overseeing the day-to-day operations of the compliance program. They are the central point of contact and play a pivotal role in ensuring the organization adheres to all applicable state and federal regulations, according to the CMS.

Responsibilities of the compliance officer include: developing and implementing the compliance program, including policies and procedures, developing and updating a compliance work plan (at least annually), and monitoring and overseeing compliance with internal policies and procedures and external regulations.

2) Medi-Cal Billing: Written policies and procedures ensure adherence to applicable laws and regulations. These policies outline the rules, procedures, and standards of conduct for all employees and stakeholders, promoting ethical and compliant behavior within the organization. Policies will outline the specific rules and guidelines for Medi-Cal billing, documentation, reimbursements, and other relevant processes.

3) Monitoring and Auditing: Regular monitoring and auditing activities are needed to identify potential compliance issues and ensure ongoing adherence to the program. The incumbent will establish robust monitoring and auditing protocols, CDCR/CCHCS will strengthen its compliance program, minimize risks, and ensure that services are provided appropriately and ethically.

**C. ROLE IN POLICY INFLUENCE (continued)**

**13. What is the CEA position's scope and nature of decision-making authority?**

The Associate Director, CalAIM Compliance and Oversight Unit's scope and nature of decision-making authority is broad over its areas of responsibilities and vast with collaboration among both internal stakeholders and external control agencies. This position will coordinate and manage CalAIM implementation for compliance and reporting policies statewide. The incumbent will be responsible for reviewing state and federal guidelines regarding Medicaid; providing policy recommendations and making decisions for CDCR/CCHCS on compliance and oversight policies. The incumbent will be a part of the executive management team and will serve as a subject matter expert for all CalAIM compliance initiatives.

**14. Will the CEA position be developing and implementing new policy, or interpreting and implementing existing policy? How?**

The Associate Director, CalAIM Compliance and Oversight Unit will provide executive leadership over the statewide CalAIM initiatives and will coordinate major program policy and operational decisions to ensure CCHCS is adhering to statewide and federal policies mandated by CMS and DHCS. There will be a significant audit and compliance reporting component to reconcile federal reimbursements and ensure the CCHCS receives the maximum reimbursements allowed within federal rules and regulations. This includes creating and implementing new policies and procedures in line with AB 133 and requirements from the DHCS and CMS. The incumbent will ensure the policies are interpreted, implemented, and enforced with staff, as well as internal and external stakeholders.