

Table D
Audit Objectives and the Methods Used to Address Them

| AUDIT OBJECTIVE | METHOD |
|---|--|
| 1 Review and evaluate the laws, rules, and regulations significant to the audit objectives. | Reviewed relevant state laws and regulations related to the objectives. |
| 2 Identify the number of SVPs placed through the program since 2000, and determine the following: a. The number who have been convicted of a new offense, broken down by category of offense and specifying sexually violent offenses that were committed within 10 years following community placement through the program. b. The number who have violated the terms and conditions of community placement and were removed from assigned housing. | <ul style="list-style-type: none"> • Reviewed court orders related to participation and placement in the program. • Reviewed program data from DSH and Coalinga State Hospital's release records to identify nonparticipating SVPs who have been unconditionally released since 2006. <p>Obtained California Department of Justice criminal history data to identify convictions for program participants and nonparticipating SVPs for arrests that occurred within 10 years of patient release. Categorized felony conviction offenses as <i>sexually violent, sexual, failure to report as a sex offender, or other</i>.</p> <p>Reviewed court orders related to program participants for whom placement in the community was revoked to determine whether these individuals violated the terms and conditions of their placements.</p> |
| 3 Review and assess DSH's process for contracting with Liberty Healthcare to manage SVPs placed in the program and determine the following: a. Whether the terms and conditions of the contract are consistent with the laws and regulations governing the placement and management of SVPs in the program. b. Whether DSH provides sufficient oversight of Liberty Healthcare's management of SVPs placed in the program, including whether DSH is ensuring that SVPs are receiving adequate treatment and, if not, how this process could be improved. c. The number of bidders DSH has considered to perform the work relating to the program and how often DSH requests bidders to submit proposals for the program. | <p>Reviewed state law to identify requirements for treating, supervising, and placing program participants in the community. Compared the terms and conditions of DSH's contract with Liberty Healthcare with the requirements specified in state law. Because the term of the contract between DSH and Liberty Healthcare ended on June 30, 2024, and a new contract had not been signed as of September 2024, we evaluated the most recent contract for the purposes of this audit.</p> <ul style="list-style-type: none"> • Haphazardly selected 10 program participants active as of April 2024 and determined whether DSH had a copy of each participant's most recent annual treatment plan and whether the participant received the required number of select services. Specifically, we tested for a current annual treatment plan and a sexual interest screening or sexual arousal assessment in 2023. We also tested for forensic individual contact (therapy), substance use screenings, and home visits in two haphazardly selected months in 2023. • Reviewed the recommendations DSH issued to Liberty Healthcare following its 2019 program review and the areas for improvement it communicated to Liberty Healthcare in its executive summaries for the eight quarterly office visits it conducted in calendar years 2022 and 2023. Interviewed staff at DSH to determine what steps the department has taken to follow up on Liberty Healthcare's remediation efforts. <p>Interviewed staff at DSH and obtained relevant records of proposals and RFIs.</p> |
| 4 Determine the total amount that DSH has paid to Liberty Healthcare and all other vendors/contractors over the past 20 years to place SVPs through the program. | <ul style="list-style-type: none"> • Interviewed financial services staff and program staff at DSH. • Obtained and analyzed available accounting and claims data and invoice records to verify payments to contractors. |
| 5 Determine the extent to which San Diego County and a selection of two additional counties have participated in the placement process, including the extent to which Liberty Healthcare has worked with the counties to ensure placements meet program requirements. | Interviewed members of housing committees in Sacramento, San Diego, and Stanislaus counties to gain their perspectives and learn about their experience working with Liberty Healthcare to locate housing for program participants. Selected these counties by reviewing all counties with pending placements and considering the number of current and historical participants in the program. Interviewed staff from the county counsel's offices, sheriff's offices, and district attorney's offices. |

continued on next page ...

| AUDIT OBJECTIVE | METHOD |
|--|---|
| <p>6 Identify how often SVPs are placed in close proximity to one another along with the number, frequency, and average cost of attempted SVP placements before the current or final placement is made.</p> | <ul style="list-style-type: none"> • Determined the distance between program participants' placement locations in the community. Determined the total number of placements within five miles of another placement. • Reviewed relevant court orders for each active program participant and for program participants awaiting an approved community placement. • Calculated the time between the court making an individual eligible for the program and the court order placing that individual at an address in the community. • Interviewed DSH staff and reviewed financial data. |
| <p>7 To the extent possible, identify ways to improve public safety outcomes and mental health outcomes related to the program.</p> | <p>Interviewed DSH staff and obtained and reviewed relevant records related to other states' laws and programs similar to the program to determine whether they have features that could improve the program's outcomes.</p> |
| <p>8 Review and assess any other issues that are significant to the audit.</p> | <p>None identified.</p> |

Source: Audit workpapers.