

I. DEFINITIONS

Unless a contrary meaning appears in context, the following definitions apply:

1. “You” shall refer to Alameda County, and its agents, employees, or departments.

2. “Document” as used herein is a broadly inclusive term, referring to any and all written or other graphic matter, however produced, generated, or reproduced, of every kind and description, including electronically stored information, and to anything upon which sounds, pictures, or electronic images are recorded, transferred, imprinted or depicted by photography, typewriting, handwriting, sound recording, or otherwise. Such terms refer to originals, copies where originals are unavailable, copies of originals that differ in any manner from the originals, and all drafts prepared in connection with such matter.

3. “MHP” shall refer to Alameda County’s Mental Health Plan.

4. “DMH” shall refer to Alameda County’s Department of Mental Health.

5. “RCLs” shall refer to Rate Classification Levels.

6. “TFC” shall refer to Therapeutic Foster Care and shall have the same definition as contained in Appendix 1 to this subpoena.

7. “Components of TFC” shall refer to the seven components of Therapeutic Foster Care as set forth in Appendix 1 to this subpoena.

8. “Wraparound services” shall, unless indicated otherwise, have the same definitions as set forth in Welfare and Institutions Code § 18251(d) and/or Appendix 2 to this subpoena.

9. “Components of wraparound services” shall refer to the nine components of wraparound services as set forth in Appendix 2 to this subpoena.

II. INSTRUCTIONS

1. A document shall be deemed to be in your “possession, custody, or control” if it is in your physical custody or was provided to you, your attorneys, employees or agents, or if it is in the physical custody of any other person and you (a) own such document in whole or in part, (b) have a right, by contract, statute or otherwise, to use, inspect, examine or copy such document on any terms, (c) have an understanding, express or implied, that you may use, inspect, examine or copy such document on any terms, or (d) have, as a practical matter, been able to use, inspect, examine or copy such document when you sought to do so.

2. Whenever reasonably practicable, please produce documents in such a manner as will facilitate their identification with the particular request or category of requests to which they are responsive.

3. As used herein, the words “and” and “or” shall be construed both conjunctively and disjunctively, and each shall include the other wherever such dual construction will serve to bring within the scope of this request any document that would otherwise not be brought within its scope.

4. As used herein, the singular form shall include the plural and vice-versa wherever such dual construction will serve to bring within the scope of this request any document which would otherwise not be brought within its scope.

5. Please note that you are requested to produce all original documents, and all duplicate documents that were altered in any manner or added to after being duplicated and thus differ in some manner from the originals.

6. Electronically stored information shall be produced either by printout of that information or by delivery of compact disk(s) with the electronically stored information copied onto the compact disks(s).

III. DOCUMENT REQUESTS

REQUEST NO. 1:

Any and all notices, bulletins, memoranda or other documents from Alameda County's MHP regarding Medi-Cal coverage within Alameda County of the components of wraparound services, including:

- A. Eligibility criteria for Medi-Cal recipients to receive any components of wraparound services from the Medi-Cal program;
- B. Procedures for Medi-Cal recipients, their families and/or other interested parties to request and receive any components of wraparound services from the Medi-Cal program; and/or
- C. Procedures for providers to bill the Medi-Cal program for providing any components of wraparound services to eligible beneficiaries.

REQUEST NO. 2:

Any and all notices, bulletins, memoranda or other documents from Alameda County's MHP regarding Medi-Cal coverage within Alameda County of the components of TFC, including:

- A. Eligibility criteria for Medi-Cal recipients to receive any components of TFC from the Medi-Cal program;
- B. Procedures for Medi-Cal recipients, their families and/or other interested parties to request and receive any components of TFC from the Medi-Cal program; and/or
- C. Procedures for providers to bill the Medi-Cal program for providing any components of TFC to eligible beneficiaries.

REQUEST NO. 3:

Any and all provider bulletins, letters, memoranda, e-mail messages or other documents from Alameda County's DMH to the mental health providers in Alameda County within the last three calendar and/or fiscal years regarding mental

health services that are reimbursable by the Medi-Cal program as rehabilitative services, case management and/or targeted case management.

REQUEST NO. 4:

Any and all memoranda, reports, studies or other documents as to the total number of children in Alameda County who have been receiving wraparound services pursuant to Welfare and Institutions Code § 18250 *et seq.*, and/or the Title IV-E waiver during the last three calendar and/or fiscal years.

REQUEST NO. 5:

Any and all memoranda, reports, studies or other documents as to the total number of children in Alameda County who have been receiving Intensive Treatment Foster Care pursuant to Welfare and Institutions Code § 18358 *et seq.*, during the last three calendar and/or fiscal years.

REQUEST NO. 6:

Any and all reports, studies, printouts or other documents regarding the total number of children in Alameda County who have been in foster care or are otherwise receiving child welfare services and who have been placed in group homes (RCL facilities) during the last three calendar and/or fiscal years.

REQUEST NO. 7:

Any and all reports, studies, printouts or other documents containing, describing or setting forth by the different levels of RCL facilities (levels 1-14) the total number of children in Alameda County who have been in foster care or are otherwise receiving child welfare services and who have been placed in these RCL facilities during the last three calendar and/or fiscal years.

REQUEST NO. 8:

Any and all reports, studies, printouts or other documents regarding the total number of children in Alameda County who have been in foster care or are

otherwise receiving child welfare services and who have been placed in Community Treatment Facilities during the last three calendar and/or fiscal years.

REQUEST NO. 9:

Any and all reports, studies, printouts or other documents regarding the total number of children in Alameda County who have been in foster care or are otherwise receiving child welfare services and who have been placed in psychiatric health facilities during the last three calendar and/or fiscal years.

REQUEST NO. 10:

Any and all reports, studies, printouts or other documents regarding the total number of children in Alameda County who have been in foster care or are otherwise receiving child welfare services and who have been placed in psychiatric hospitals during the last three calendar and/or fiscal years.

REQUEST NO. 11:

Any and all reports, studies, printouts or other documents regarding the total number of children in Alameda County who have been in foster care or are otherwise receiving child welfare services and who have been placed out of state during the last three calendar and/or fiscal years.

REQUEST NO. 12:

Any and all reports, studies, printouts or other documents regarding the total number of children in Alameda County who have been in foster care or are otherwise receiving child welfare services and who have been referred from the dependency to delinquency systems during the last three calendar and/or fiscal years.

REQUEST NO. 13:

Any and all reports, studies, printouts or other documents regarding the total number of children in Alameda County who have been in foster care or are otherwise receiving child welfare services and who have received mental health

services pursuant to Welfare and Institutions Code § 5878.1 *et seq.* during the last three calendar and/or fiscal years.

REQUEST NO. 14:

Any and all reports, studies, printouts or other documents regarding Alameda County's current policies and procedures as to the operations of its interagency placement committees pursuant to Welfare and Institutions Code § 4096 *et seq.*

REQUEST NO. 15:

Any and all reports, studies, printouts or other documents regarding Alameda County's current policies and procedures on providing any of the following services to children in the delinquency system in Alameda County:

- A. wraparound services pursuant to Welfare and Institutions Code § 18250 *et seq.*, and/or the Title IV-E waiver;
- B. intensive treatment foster care pursuant to Welfare and Institutions Code § 18358 *et seq.*;
- C. multisystemic therapy; and/or
- D. any other in-home behavioral supports and/or crisis services.

REQUEST NO. 16:

Any and all reports, studies, printouts or other documents regarding Alameda County's current policies and procedures on providing any of the following services to children in special education programs in Alameda County:

- A. wraparound services pursuant to Welfare and Institutions Code § 18250 *et seq.*, and/or the Title IV-E waiver;
- B. intensive treatment foster care pursuant to Welfare and Institutions Code § 18358 *et seq.*;
- C. multisystemic therapy; and/or
- D. any other in-home behavioral supports and/or crisis services.

REQUEST NO. 17:

Any and all bulletins, letters, memoranda, reports or other documents that set forth, describe, discuss or refer to:

A. the total number of children in Alameda County who have been receiving specialized care increment payments pursuant to Welfare and Institutions Code § 11461(e)(1) during the last three calendar and/or fiscal years due to the behavioral or mental health needs of the child;

B. the current amount of the specialized care increment paid per child by Alameda County pursuant to Welfare and Institutions Code § 11461(e)(1) due to the child's behavioral or mental health needs; and/or

C. the criteria currently used by Alameda County to determine which children shall receive specialized care increment payments pursuant to Welfare and Institutions Code § 11461(e)(1) during the last three calendar and/or fiscal years due to the behavioral or mental health needs of the child.