

Imperial County Plan of Correction
Per the Performance Contract Review Report for Review Dates March 26-27, 2019

Finding # or Suggested Improvement #	Finding or Suggested Improvement	Recommendation # (State Corrective Action Step / Identify Timeline / and Evidence of Corrections / Mechanisms for Monitoring Effectiveness)		Score – Comments/Notes
Finding #1	Imperial County did not identify unserved or underserved populations within the approved FY 2017-20 Three-Year Program and Expenditure Plan (Plan) and the FY 2018-19 Annual Update (Update). (California Code of Regulations, Title 9, § 3300(b)(A)).	The County shall clearly identify underserved and unserved populations within the approved Plan and Update and the methodology for identifying them, in the approved FY 2020-23 Plan, FY 2019-20 Update and each subsequent Plan and Update thereafter.	ICBHS will clearly identify in its FY 2020-2023 Three-Year Program and Expenditure Plan and subsequent Annual Updates who the underserved and unserved populations are in Imperial County and how they were identified. MHSA stakeholder participation will reflect those underserved and unserved populations. This information will be incorporated into the FY 2020-2023 Three-Year Program and Expenditure Plan, which will be completed by 6/30/20, and all subsequent annual updates and plans.	The submitted plan is accepted.
Finding #2	Imperial County did not submit the approved FY 2017-20 Plan and FY 2018-19 Update to Department of Health Care Services (DHCS) within 30 days after adoption. (Welfare and Institution	The County shall submit the approved FY 2020-23 Plan and FY 2019-20 Update to DHCS at MHSAs@dhcs.ca.gov and the Mental Health Oversight and Accountability Commission	ICBHS will update Policy 16-26, MHSA Three-Year Program and Expenditure Plan, to include the provision that the Three-Year Program and Expenditure Plan and subsequent Annual Updates will be submitted to DHCS within 30 days after adoption.	The submitted plan is accepted.

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	(W&I) Code, Section 5847(a)).	(MHISOAC) within 30 days of adoption by the County Board of Supervisor and each subsequent Plan and Update thereafter.	Imperial County's FY 19-20 Annual Update was submitted to DHCS as required.	
Finding #3	Imperial County did not identify Full Service Partnership (FSP) target numbers by age group (Child, Transitional Age Youth, Adult and Older Adult) in the approved FY 2017-20 Plan. (Cal. Code Regs., tit. 9, § 3650(a)(3)).	The County shall identify FSP target numbers by age group (Child, Transitional Age Youth, Adult, and Older Adult) in the approved FY 2020-23 Plan each subsequent Plan thereafter.	ICBHS will identify FSP target numbers by age group into the FY 2020-2023 Three-Year Program and Expenditure Plan, which will be completed by 6/30/20, and all subsequent annual updates and plans.	The submitted plan is accepted.
Finding #4	Imperial County's approved FY 2017-20 Plan and FY 2018-19 Update did not include reports of achievement of performance outcomes for MHSA services. (WIC Section 5848(c), County Performance Contract (6)(A)(5)(d)).	<p>The County's approved FY 2020-23 Plan and FY 2019-20 Update shall include reports of achievement of performance outcomes for MHSA services and for each subsequent Plan and Update thereafter.</p> <p>The County contracts with providers shall include performance goals from the County's Plan and Updates</p>	<p>ICBHS will continue to administer the outcome measurement tools included in the current MHSA Plan at the beginning of treatment and at the designated intervals. ICBHS will work with Information Systems to be able to generate reports to show client progress over time and report performance outcome data in the FY 2020-2023 Three-Year Program and Expenditure Plan, which will be completed by 6/30/20, and all subsequent annual updates and plans.</p> <p>ICHS will amend its existing provider contracts to include the performance goals established in the FY 2020-2023 Three-Year Program and</p>	The submitted plan is accepted.

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		<p>that apply to each provider's programs and services.</p>	<p>Expenditure Plan and all subsequent annual updates and plans</p> <p><u>Revised 6/14/22 – Updated Action Steps</u> <i>According to the approved Plan of Correction, Imperial County committed to review the Findings, evaluate any programmatic recommendations, and reply by June 30, 2020 but due to system limitations and operational impacts from the COVID-19 pandemic, Imperial County has revised the Plan of Correction for Finding #4 on 6/14/22.</i></p> <p><i>ICBHS will continue to administer the outcome measurement tools included in the current MHSA Plan at the beginning of treatment and at the designated intervals. ICBHS will work with Information Systems to be able to generate reports to show client progress over time and report performance outcome data in future reports. ICBHS is currently working with a consultant to evaluate these reports; however, with the changes being made to our EHR, as a result of CalAIM, the availability and/or development of these reports will have to be re-evaluated.</i></p>	

			<p><i>Included in the FY 22-23 Annual Update is a report on the achievement of Plan goals and objectives for each program.</i></p> <p><i>Currently ICBHS does not have any existing provider contracts. Any future provider contracts developed will include performance goals as established in subsequent annual updates and plans.</i></p>	
Finding #5	<p>Imperial County's approved FY 2017-20 Plan and FY 2018-19 Update did not clearly identify which Prevention and Early Intervention (PEI) programs fall under each PEI program category. (Cal. Code Regs., tit. 9, § 3755).</p>	<p>The County shall identify which Prevention and Early Intervention (PEI) programs fall under each PEI program category:</p> <ul style="list-style-type: none"> • Prevention • Early Intervention • Outreach for Increasing Recognition of Early Signs of Mental Illness • Access & Linkage to Treatment • Stigma & Discrimination Reduction • Suicide Prevention (optional) <p>PEI programs under each program category shall be clearly identified within the approved FY 2020-23 Plan, FY 2019-20 Update, and each subsequent Plan and Update thereafter.</p>	<p>Imperial County's approved FY 2017-2018 and FY 2018-2019 included the Prevention and Early Intervention programs under each of the five categories. In the current approved MHS A Annual Plan for FY 19-20, Imperial County has clearly identified all of the PEI programs under each of the categories, to include; Prevention, Early Intervention, Outreach for Increasing Recognition of Early Signs of Mental Illness, Access & Linkage to Treatment and Stigma & Discrimination Reduction.</p> <p>Additionally, in the upcoming MHS A Three Year Plan for FY 2020-2023 Imperial County will also continue to identify the PEI program categories and well as in all future MHS A Plans, to include the Annual, Three Year and Evaluation Plans.</p>	<p>The submitted plan is accepted.</p>

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Suggested Improvement #1	DHCS recommends the County incorporate all aspects of the current CPPP process into current County written policies and procedures and/or duty statements. This includes CPPP designated positions, staff training, stakeholder training, client and stakeholder outreach and involvement.	The County will begin the review process of incorporating all aspects of the current CPPP process into current County written policies and procedures and/or duty statements. This includes CPPP designated positions, staff training, stakeholder training, client and stakeholder outreach and involvement.	ICBHS will begin the process of reviewing and identifying potential updates (based on the suggested improvements) to Policy# 01-279: MHTA-Community Program Planning Process (CPPP) if needed: Areas to review include: <ul style="list-style-type: none"> • Identification of staff positions responsible for the overall Community Program Planning Process and Coordination and Management of the CPP process. • Outreach to clients and stakeholders: unserved and/or underserved populations and their family members. • Training for County staff designated responsible for the CPPP that will enable staff to establish and sustain a CPP process: • Training Stakeholders, to include clients, client's family, and community service providers who participate in CPP processes. 	The submitted plan is accepted.

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Suggested Improvement #2	DHCS recommends the County define and describe FSP processes, including the FSP step-down process, into formal written policies and procedures.	The County will begin the review process to better define and describe FSP processes, including the FSP step-down process in its policies and procedures.	ICBHS will begin the process of reviewing and identifying potential updates (based on the suggested improvements) to its current policies and procedures that define and describe the FSP Processes, including the FSP step-down process. Policies to review include: <ul style="list-style-type: none"> • Policy# 01-253: MHSA – Full Service Partnership (FSP) Coordinated Service Plan (CSP); • Policy# 01-256: MHSA – Full Service Partnership (FSP) Team; • Policy# 01-257: MHSA – Youth and Young Adult Services Full Service Partnership (FSP) Team; • Policy #01-261: MHSA – Adult Services Full Service Partnership (FSP) Team 	The submitted plan is accepted.
Suggested Improvement #3	DHCS recommends program names and service categories detailed in the approved Plan and Update match the program names and service categories in the Annual Revenue and Expenditure Report (ARER).	The County will ensure that program names and service categories detailed in the MHSA Plan and Annual Update will match the program names and services categories in the ARER.	3. ICBHS has incorporated the Suggested Improvements #3, #3a, #3b to the MHSA Three-Year Program and Expenditure Plan for FY 2020-2021 through FY 2022-2023 and will incorporate in future, MHSA Updates, and ARER's: ICBHS will ensure consistency of program names and service categories to match in MHSA Plans, MHSA Updates, and in the MHSA ARER's.	The submitted plan is accepted.

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Suggested Improvement #3a	The ARER should be consistent with the budget in the approved Plan and Update. If the program or service did not occur, report the program or service on the ARER and indicate zero (0) expenditures.	The County will adopt consistency with the budget in the approved MHSA Plan and Annual Update. The County will indicate zero expenditures if a program or service did not occur.	3a. ICBHS will maintain consistency between the budgets and approved plans / updates. ICBHS will report zero (0) expenditures when services or programs did not occur.	
Suggested Improvement #3b	DHCS recommends the County provide a budget for each fiscal year in the approved Plan and Update.		3b. ICBHS will provide a budget for each fiscal year	