County of Santa Clara Plan of Correction

Per the County Performance Contract Review Report for Review Dates May 18, 2021

lr A	Finding #, Suggested nprovement # or Technical Assistance #	Finding, Suggested Improvement or Technical Assistance	Correc	State Corrective Action Step/Identify Timeline/and Evidence of tions/Mechanisms for Monitoring Effectiveness)	Score – Comments/Notes
	inding #1	Santa Clara County did not provide a description of county demographics, including but not limited to: size of the county, threshold languages, unique characteristics, age, gender, and race/ethnicity in the adopted FY 2019-20 Annual Update (Update). (California Code of Regulations, title 9, section 3300(b)(4)).	languages, unique characteristics, age, gender, and race/ethnicity, in the adopted FY 2020-23 Three-Year Program and Expenditure Plan (Plan), FY 2021-22 Update and each	 The FY2021 to FY2023 Three-Year Program and Expenditure Plan was adopted on June 2, 2020 by the County of Santa Clara Board of Supervisors, which covers the period of July 1, 2020 to June 30, 2023. Since the County Performance Contract Review was conducted on May 18, 2021, and the subsequent report received on October 4, 2021, the County of Santa Clara proposes that the recommendations and corresponding plan of correction would apply to the County's FY2023 MHSA Annual Plan Update (currently in the local review process) and each subsequent Plan and Update thereafter. The next Three-Year community program planning process is to begin in early 2022. a) The County of Santa Clara included county demographics information as well as populations served by MHSA programs and services for its most recent annual update: the FY2023 MHSA Annual Plan Update (Draft Plan), currently under local public review. The FY2023 Draft Plan covers the period from July 1, 2022 to June 30, 2023. Please refer to pp. 24-25 (county demographics) and p. 27 (populations served by MHSA). The Draft Plan can be access here: MHSA-Annual Plan Combined-FY2022_MYA-and-FY2023_0.pdf (sccgov.org). b) The County of Santa Clara has completed the 30-day public posting of the Draft Plan and held a Public Hearing on November 8, 2021 with the County of Santa Clara Behavioral Health Board. The next step is to request approval and adoption of the Draft Plan by the County of Santa Clara Board of Supervisors' slated for December 14, 2021. Once the Draft Plan has been adopted and approved, it will be submitted to the MHSOAC and DHCS 	The submitted plan is accepted.

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			 within 30 days after the County of Santa Clara Board of Supervisors' approval. <u>Update as of June 2022 as requested by DHCS on June 2,</u> <u>2022</u> The County of Santa Clara submitted/emailed the latest adopted Annual Update Plan document as described above on January 12, 2022 to the MHSOAC and DHCS within 30 days of the County Board of Supervisors' approval and adoption of the plan, which took place on December 14, 2021. Attached as part of the County's response to DHCS is the January 2022 email with the plan document sent to <u>Sharmil.Shah@mhsoac.ca.gov</u> and <u>mhsa@dhcs.ca.gov</u>. Please refer to pages 24 - 27 of the plan document. In addition, the County of Santa Clara will establish policies and procedures (P&P) to ensure these requirements will be performed on an ongoing basis and estimates providing DHCS with a finalized P&P by December 2022. 	
Finding #2	Santa Clara County did not include a description of how stakeholder involvement demonstrates a partnership with constituents and stakeholders throughout the process that includes meaningful	Recommendation #2: The County must include a description of how stakeholder involvement demonstrates a partnership with constituents and stakeholders throughout the process that includes meaningful stakeholder involvement on:	 The County of Santa Clara is dedicated to stakeholder involvement. In order to ensure participation at all levels of decision-making, for the current community planning process: a. The County of Santa Clara conducted a total of 18 public meetings that were held as part of this community program planning process (FY2023 MHSA Annual Plan Update – Draft Plan). Please refer to p. 19. The Draft Plan can be accessed here: MHSA-Annual Plan Combined-FY2022 MYA-and- FY2023 0.pdf (sccgov.org). b. The County of Santa Clara administered a client/consumer survey in early 2021, which was available in all county threshold languages: English, Spanish, Vietnamese, Chinese, and Tagalog, with over 269 respondents completing the survey. The findings from this survey were shared with 	The submitted plan is accepted.

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inv mo pc pla im qu im ev bu all the 20 Up (M lns Cc 58 Re	takeholder ivolvement on: inental health olicy, program lanning and nplementation, nonitoring, uality nprovement, valuation, and udget llocations in ne adopted FY 019-20 pdate. Velfare and istitutions ode section 848; Cal. Code egs., tit. 9, §§ 315, 3300).	mental health policy, program planning and implementation, monitoring, quality improvement, evaluation, and budget allocations in the adopted FY 2020-23 Plan, FY 2021-22 Update and each subsequent Plan and Update thereafter.	 stakeholders and utilized to inform the FY2023 annual update planning process (as well as FY2022 Mid-Year adjustment of the adopted FY2022 Plan). Please refer to pp. 21-23 on the current FY2023 MHSA Annual Plan Update (Draft Plan) ourrently under local public review. The Draft Plan can be accessed here: MHSA-Annual Plan Combined-FY2022 MYA-and-FY2023 0.pdf (sccqov.org). c. Also, the County of Santa Clara will launch a comprehensive, targeted stakeholder input solicitation campaign in early 2022 to prepare for the next MHSA Three-Year Plan covering fiscal years 2024 to 2026, similar to the extensive needs assessment process and independent review conducted for the last FY2020 to FY2023 MHSA Program and Expenditure Plan. Please refer to the Report of Analysis here: MHSA-Community-Planning-Process-Evaluation-Report-FY20 FY21-23.pdf (sccqov.org). As part of the FY2024 to FY 2026 three-year planning process, the County will administer an MHSA Community Survey in early 2022, share the survey findings with the public, and use survey findings to help inform the development of the County's next Plan. d. The planning approach and community planning activities for the FY2023 MHSA Annual Update were shared and circulated to engage all stakeholders in the process. The County's MHSA team also conducted MHSA 101 trainings for all new and existing Stakeholder Leadership Committee Members (the county representative group validating the local process). Please refer to pp. 18-20. Please refer to p. 23 for the demographic profile of stakeholder participation. The Draft Plan can be accessed here: MHSA-Annual Plan Combined-FY2022 MYA-and-FY2023 0.pdf (sccqov.org). Update as of June 2022 as requested by DHCS on June 2, 2022 	

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			The County of Santa Clara submitted/emailed the latest adopted Annual Update Plan document as described above on January 12, 2022 to the MHSOAC and DHCS within 30 days of the County Board of Supervisors' approval and adoption of the plan, which took place on December 14, 2021. Attached as part of the County's response to DHCS is the January 2022 email with the plan document sent to <u>Sharmil.Shah@mhsoac.ca.gov</u> and <u>mhsa@dhcs.ca.gov</u> . Please refer to pages 18 - 23 of the plan document. In addition, the County of Santa Clara will establish policies and procedures (P&P) to ensure these requirements will be performed on an ongoing basis and estimates providing DHCS with a finalized P&P by December 2022.	
Finding #3	Santa Clara County did not submit the adopted FY 2019-20 Update to the Department of Health Care Services (DHCS) within 30 days after adoption by the County Board of Supervisors, which occurred on May 21, 2019. (W&I Code section 5847(a)).	Recommendation #3: The County must submit the adopted FY 2020-23 Plan, FY 2021-22 Update and each subsequent Plan and Update thereafter to DHCS within 30 days of Board of Supervisor approval.	In addition to submitting approved Updates and Plans to the MHSOAC after Board of Supervisor approval, the County of Santa will ensure the County's adopted Update or Plans will also be submitted to DHCS within 30 days of the County Board of Supervisors' approval. The County of Santa Clara has completed the 30-day public posting of its most recent MHSA Annual Update covering FY2023: July 1, 2022 to June 30, 2023. A Public Hearing on November 8, 2021 was conducted with the County of Santa Clara Behavioral Health Board. The next step is to request approval and adoption of the Draft Plan by the County of Santa Clara Board of Supervisors' slated for December 14, 2021. Once adoption of the Draft Plan occurs, the County will submit via email the FY2023 MHSA Annual Update document within 30 days after the County of Santa Clara Board of Supervisor approval.	The submitted plan is accepted.

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			The County of Santa Clara submitted/emailed the latest adopted Annual Update Plan document as described above on January 12, 2022 to the MHSOAC and DHCS within 30 days of the County Board of Supervisors' approval and adoption of the plan, which took place on December 14, 2021. Attached as part of the County's response to DHCS is the January 2022 email with the plan document sent to <u>Sharmil.Shah@mhsoac.ca.gov</u> and <u>mhsa@dhcs.ca.gov</u> . Please refer to page 29 of the plan document. In addition, the County of Santa Clara will establish policies and procedures (P&P) to ensure these requirements will be performed on an ongoing basis and estimates providing DHCS with a finalized P&P by December 2022.	
Finding #4	Santa Clara County did not provide an estimate of the number of clients, in each age group, to be served in the Full Service Partnership (FSP) category for each fiscal year in the adopted FY 2019-20 Update. (Cal. Code Regs., tit. 9, § 3650(a)(3)).	Recommendation #4: The County must provide an estimate of the number of FSP clients to be served in each age group: children (0-15), transitional age youth (16-25), adult (26-59), and older adult (60 and older) for each fiscal year in the adopted FY 2020-23 Plan, FY 2021-22 Update, and each subsequent Plan and Update thereafter.	The County of Santa Clara will provide an estimate of the number of FSP clients to serve in each age group: children (0-15), transitional age youth (16-25), adult (26-59), and older adult (60 and older) for FY2023 Annual Plan Update (Draft Plan), currently in the local review process, and each subsequent Plan and Update thereafter. The County of Santa Clara will institute a process to ensure that within each FSP program description, an estimate of the number of clients to be served by age is included in the approved FY2023 MHSA Annual Plan Update and Program and Expenditure Plans per California Code of Regulation, title 9, section 3310(e). This process will include each County Behavioral Health Services Department Division Director (Children, Youth, Adults, Older Adults, including Criminal Justice Services) drafting the FSP sections to include the estimated number of FSP clients to be served is included in the narrative. The Draft Plan is slated for the County of Santa Clara Board of Supervisors' approval on December 14, 2021. Once the Plan is adopted, the approved Plan	The submitted plan is accepted.

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			 will be submitted to DHCS, which includes the estimated number of FSP clients to be served by each age group, within 30 days after the Board of Supervisors' approval. Update as of June 2022 as requested by DHCS on June 2, 2022 The County of Santa Clara submitted/emailed the latest adopted Annual Update Plan document as described above on January 12, 2022 to the MHSOAC and DHCS within 30 days of the County Board of Supervisors' approval and adoption of the plan, which took place on December 14, 2021. Attached as part of the County's response to DHCS is the January 2022 email with the plan document sent to Sharmil.Shah@mhsoac.ca.gov and mhsa@dhcs.ca.gov. Please refer to pages 32 and 56 of the plan document. In addition, the County of Santa Clara will establish policies and procedures (P&P) to ensure these requirements will be performed on an ongoing basis and estimates providing DHCS with a finalized P&P by December 2022. 	
Finding #5	Santa Clara County did not report cost per person for Community Services and Supports (CSS), Prevention and Early Intervention (PEI), and Innovation (INN) programs in the	Recommendation #5: The County must report cost per person for CSS, PEI, and INN programs in the adopted FY 2020-23 Plan, FY 2021-22 Update and each subsequent Plan and Update thereafter.	Starting with the FY2023 Annual Plan Update (currently in the local review process) and each subsequent Plan and Update thereafter, the County of Santa Clara will include the cost per person for CSS, PEI, and INN programs in the adopted Update. This item will be completed by December 14, 2021 - the expected review date for the approval of the current FY2023 MHSA Annual Plan Update (Draft Plan) by the County of Santa Clara Board of Supervisors. Once the Draft Plan is adopted, it will be submitted to DHCS, which will include the cost per person information for CSS, PEI, and INN programs, within 30 days after the Board of Supervisors' approval.	The submitted plan is accepted.

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	adopted FY 2019-20 Update. (W&I Code section 5847(e)).		The County of Santa Clara submitted/emailed the latest adopted Annual Update Plan document as described above on January 12, 2022 to the MHSOAC and DHCS within 30 days of the County Board of Supervisors' approval and adoption of the plan, which took place on December 14, 2021. Attached as part of the County's response to DHCS is the January 2022 email with the plan document sent to <u>Sharmil.Shah@mhsoac.ca.gov</u> and <u>mhsa@dhcs.ca.gov</u> . Please refer to the following pages in the plan document: • For CSS, pages 30 - 32, 49 - 56 • For PEI, pages 87 - 500 • For INN, page 550 In addition, the County of Santa Clara will establish policies and procedures (P&P) to ensure these requirements will be performed on an ongoing basis and estimates providing DHCS with a finalized P&P by December 2022.	
Finding #6	Santa Clara County did not specify the methods and activities to be used in each of their Stigma and Discrimination Reduction Programs, to change attitudes, knowledge, and/or behavior regarding being diagnosed with	Recommendation #6 - The County must specify the methods and activities to be used in each of their Stigma and Discrimination Reduction Programs, to change attitudes, knowledge, and/or behavior regarding being diagnosed with mental illness, having mental illness and/or seeking mental health services including	Since the MHSA 2021 DHCS audit review, the County of Santa Clara MHSA PEI Manager has been working with all of the County's Stigma and Discrimination Reduction Programs to specify methods and activities used in each Stigma and Reduction Programs to change attitudes, knowledge, and/or behavior regarding being diagnosed with mental illness, having a mental illness and/or seeking mental health services. The recommendation for finding #6 has been implemented into all PEI Stigma and Discrimination Programs. The detailed findings can be found in the FY2023 Annual Plan Update as part of the PEI evaluation report. Also provided is additional information: The Cultural Communities Wellness Program , a County- operated program, has used validated tools to create pre-and post- surveys. The program has started to administer this survey to all program clients beginning July 1, 2021, in order to collect stronger	The submitted plan is accepted.

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ha illr se he inc tim me the 20 Up Cc 9, 37 Cc	nental illness, aving mental ness and/or eeking mental ealth services icluding meframes for neasurement in ne adopted FY 019-20 pdate. (Cal. ode Regs., tit. §§ 3750(d), 755(f)(3); W&I ode section 840).	timeframes for measurement in the adopted FY 2020-23 Plan and FY 2021-22 Update, and each subsequent Plan and Update thereafter.	 outcome measures. The tool was adapted from the "The Stigma Scale: Development of a Standardized Measure of the Stigma of Mental Illness." This survey will be used to measure changes in attitudes and behavior in clients going forward. A sample version of this tool can be found in the FY2019 to FY2021 three-year PEI evaluation report on page 290 of the document (https://bhsd.sccgov.org/sites/g/files/exicpb711/files/documents/MH SA-Annual_PIan_Combined-FY2022_MYA-and-FY2023_0.pdf). Starting FY2019 (July 1, 2018 to June 30, 2019), the New Refugees Program began administering the Current Adaptive Functioning Index-Cross-Cultural Version (CAFI-XC) tool as well as other client satisfaction surveys to measure client outcomes and changes in attitudes/knowledge and/or behavior. The updated findings and timeframes can be found in the FY2019 to FY2021, a three-year PEI evaluation report, starting on p. 255 of the document (https://bbsd.sccgov.org/sites/g/files/exicpb711/files/documents/MH SA-Annual_PIan_Combined-FY2022_MYA-and-FY2023_0.pdf). The program will continue to provide this information in future updates. The Cultural is Prevention Program was moved to the Culture-Specific Wellness Center Program beginning FY2021 and is no longer a Stigma and Discrimination Reduction Program. Therefore, the program will collect and report on the required data for the Improve Timely Access to Services for Underserved Populations Program. Update as of June 2022 as requested by DHCS on June 2, 2022 The County of Santa Clara submitted/emailed the latest adopted Annual Update Plan document as described above on January 12, 	

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			2022 to the MHSOAC and DHCS within 30 days of the County Board of Supervisors' approval and adoption of the plan, which took place on December 14, 2021. Attached as part of the County's response to DHCS is the January 2022 email with the plan document sent to <u>Sharmil.Shah@mhsoac.ca.gov</u> and <u>mhsa@dhcs.ca.gov</u> . Please refer to pages 254 - 306 of the plan document. In addition, the County of Santa Clara will establish policies and procedures (P&P) to ensure these requirements will be performed on an ongoing basis and estimates providing DHCS with a finalized P&P by December 2022.	
Suggested Improvement #1:	MHSA Plans and Updates	Suggested Improvement 1: DHCS recommends the County clearly identify the County's underserved/ unserved populations in the County demographics section of the adopted Plans and Updates.	Based on this suggested improvement, starting with the FY2023 MHSA Annual Update (currently in the local review process), the County of Santa Clara has incorporated an expanded section identifying the County's underserved/unserved populations in the county demographics section of the Plan. Please refer to p. 27 of the Draft Plan. The County will ensure this continues for each Update and Plan. The Draft Plan can be accessed here: <u>MHSA- Annual Plan Combined-FY2022 MYA-and-FY2023 0.pdf</u> (sccgov.org). Update as of June 2022 as requested by DHCS on June 2, <u>2022</u> The County of Santa Clara submitted/emailed the latest adopted Annual Update Plan document as described, which includes the PEI Evaluation Report, on January 12, 2022 to the MHSOAC and DHCS within 30 days of the County Board of Supervisors' approval and adoption of the plan, which took place on December 14, 2021. Attached as part of the County's response to DHCS is the January 2022 email with the plan document sent to Sharmil.Shah@mhsoac.ca.gov and mhsa@dhcs.ca.gov.	The submitted plan is accepted.

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Technical Assistance	#1.	The adopted FY 2020- 23 Plan must include the bilingual proficiency in threshold languages for service providers in the County's assessment of its cap acity to implement proposed MHSA programs. (Cal. Code Regs., tit. 9, § 3650(a)(5)(A)).	The County's FY2021 to FY2023 Three-Year Program and Expenditure Plan was adopted on June 2, 2020. Since the County Performance Contract Review was conducted on May 18, 2021 and the subsequent report received on October 4, 2021, the County of Santa Clara proposes that the recommendations and corresponding plan of correction would apply to the FY2023 MHSA Annual Plan Update, currently in the local review process, and also each subsequent Plan and Update thereafter. The FY2023 MHSA Annual Update plan (Draft Plan) includes language capacity that reflects the County's threshold languages. Here are a few examples of CSS and PEI programs: p. 65 for Downtown Mental Health Service Teams, p. 66 for Integrated Mental Health and Autism Services, p. 114 with Reach Out and Read, and p. 159 with Integrated Prevention Services for Cultural Communities. The Draft Plan can be accessed here: <u>MHSA-Annual Plan_Combined- FY2022_MYA-and-FY2023_0.pdf (sccgov.org)</u> .	The submitted plan is accepted.
Technical Assistance	#2.	The adopted FY 2020- 23 Plan and FY 2021- 22 Update must include documentation of achievement in performance outcomes for CSS, PEI, and INN. (County Performance Contract (6.)(A.)(5)(d.); W&I section 5848).	The County's FY2021 to FY2023 Three-Year Program and Expenditure Plan was adopted on June 2, 2020. Since the County Performance Contract Review was conducted on May 18, 2021 and the subsequent report received on October 4, 2021, the County of Santa Clara proposes that the recommendations and corresponding plan of correction would apply to the FY2023 MHSA Annual Plan Update (currently in the local review process) and each subsequent Plan and Update thereafter. The FY2023 MHSA Annual Update (Draft Plan) includes outcomes for CSS, PEI, and INN. Of note is the PEI three-year evaluation report included in the Draft Plan, which starts on p. 77, which can be accessed here: <u>MHSA-Annual Plan Combined-FY2022 MYA- and-FY2023 0.pdf (sccgov.org)</u> .	The submitted plan is accepted.

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Technical Assistance	#3	#3. The adopted FY 2020-23 Plan and FY 2021-22 Update PEI and INN program names listed in the budget must be consistent with the names in the approved ARER. The budget in the approved Plan and Update must be consistent with the approved ARER. If the program or service did not occur, report the program or service on the approved ARER and indicate zero expenditures. Any discrepancies or name changes must be explained in the adopted Plan and Update. (W&I Code section 5892(g); Cal. Code Regs., tit. 9, § 3320(a)).	The County of Santa Clara will monitor MHSA Program name changes to ensure the ARER is consistent with the budget in the approved Three-Year Plan and Annual Update. If the program or service did not occur, the County of Santa Clara will report the program or service on the ARER and indicate zero expenditures. These changes will be included in the next approved FY2022 ARER and subsequent reports thereafter. This item will be completed once the FY2022 ARER is completed by the County's Finance Team and approved.	The submitted plan is accepted.
Technical Assistance	#4	The adopted FY 2020- 23 Plan must be converted onto a three year cycle	The County's FY2021 to FY2023 Three-Year Program and Expenditure Plan was adopted on June 2, 2020. The County Performance Contract Review was conducted on May 18, 2021, and the subsequent report was received on October 4, 2021. The	The submitted plan is accepted.

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		corresponding with the FY 2020-23 and encompass the fiscal year starting with July 1, 2020 through June 30, 2021, FY 2021- 2022 (July 1, 2021 through June 30, 2022, FY 2022-2023 (July 1, 2022 through June 30 2023) and each subsequent Plan thereafter (i.e., FY 2020-2023, FY 2023- 26, FY 2026-30).	County of Santa Clara reviewed Information Notices and could not locate formal guidance from the State on the suggested naming convention as reflected for this technical assistance recommendation. However, the County's adopted FY2021- FY2023 Three-Year Program and Expenditure Plan does cover the period of July 1, 2020, to June 30, 2023, so there is no need to convert as the current planning cycle aligns with the technical assistance recommendation. Also, for the most recent Update for FY2023 (under local review), the period the Update covers are from July 1, 2022 to June 30, 2023. Once the Update is adopted, slated for Board of Supervisors' review on December 14, 2021, the approved Update will be submitted to DHCS, reflecting the period described here. If there is an Information Notice and/or a specific CCR that the County of Santa Clara is not aware of regarding the suggested naming conventions, please kindly share that with the County.	
Technical Assistance	#5	The adopted FY 2020- 21 Update title page 'fiscal year' must be spelled out (i.e., FY 2020-21, not FY 2020) and reflect the fiscal year identified (i.e., July 1, 2020 through June 30, 2021) and for each subsequent Update thereafter.	The County's FY2021 to FY2023 Three-Year Program and Expenditure Plan was adopted on June 2, 2020. The County Performance Contract Review was conducted on May 18, 2021, and the subsequent report was received on October 4, 2021. The County of Santa Clara reviewed Information Notices and could not locate formal guidance on the suggested naming convention as reflected for this technical assistance recommendation. Also, as shared on the November 2021 Conference Call with DHCS, the County has a different naming convention. For example, the period of July 1, 2022 to June 30, 2023 is described as FY2023. For the most recent FY2023 MHSA Annual Update Plan Update (currently in the local review process), the approved Update document will reflect a title page that spells out the fiscal year 2023 as covering July 1, 2022 to June 30, 2023 and fiscal year 2022 Mid-Year Adjustment plan as covering July 1, 2021 to June 30, 2022. Once the Update is adopted, slated for Board of Supervisors' review on December 14, 2021, the approved Update will be submitted to	The submitted plan is accepted.

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		 DHCS, reflecting the period described here. If there is an Information Notice and/or a specific CCR the County of Santa Clara is not aware of regarding the suggested naming conventions, please kindly share that with the County. Update as of June 2022 as requested by DHCS on June 2, 2022 The County's MHSA community planning process and adoption of MHSA plans and three-year plans have been in alignment with WiC 5847, 5848, and 5892, with the most recent example, the County's most recent Annual Update approved/adopted by the County Board of Supervisors in December 2021 as described above. As reflected in the plan document, the County's fiscal year starts on July 1 and ends on June 30. The tile page of the plan document reflects the following: Mental Health Services Act (MHSA) Fiscal Year 2022 Mid-Year Adjustment (July 1, 2021 - June 30, 2022) & Fiscal Year 2023 Annual Plan Update (July 1, 2022 - June 30, 2023). The County of Santa Clara submitted/emailed the latest adopted Annual Update Plan document as described above on January 12, 2022 to the MHSOAC and DHCS within 30 days of the County Board of Supervisors' approval and adoption of the plan, which took place on December 14, 2021. Attached as part of the County's response to DHCS is the January 2022 email with the plan document sent to Sharmil.Shah@mhsoac.ca.gov and mhsa@dhcs.ca.gov. 	