

Siskiyou County Plan of Correction
Per the Performance Contract Review Report for Review Dates June 25-26, 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	Siskiyou County submitted the FY 2017-18 Annual Revenue and Expenditure Report (ARER) past the due date. (California Code of Regulations, Title 9, § 3510(b)).	Recommendation #1	<p>The County shall submit the FY 2018-19 ARER no later than December 31, following the end of the fiscal year.</p> <ul style="list-style-type: none"> • Siskiyou County shall provide training to all fiscal staff on reconciling accounts and completing worksheets for the ARER by March 31, 2020. • Develop procedures to balance MHSA expenditures to operating ledger and collect data for entering into ARER two months prior to report due date. October 31, 2020. <p>County will submit ARER to the County Auditor for review by November 15 to ensure ARER is submitted to DHCS no later than December 31, following the end of the fiscal year.</p>	The submitted plan is accepted.
Finding #2:	Siskiyou County did not submit the approved FY 2017-20 Three-Year Program and	Recommendation #2:	The County shall submit the approved FY 2020-23 Plan and FY 2019-20 Update to DHCS at	The submitted plan is accepted.

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	<p>Expenditure Plan (Plan) to the Department of Health Care Services (DHCS) within 30 days after adoption. (Welfare and Institution (W&I) Code, Section 5847(a)).</p>	<p>MHSA@dhcs.ca.gov and the Mental Health Oversight and Accountability Commission (MHSOAC) within 30 days of adoption by the County Board of Supervisors and each subsequent Plan and Update thereafter.</p> <ul style="list-style-type: none"> • Siskiyou County submitted the FY19/20 Annual Update to the MHSA Oversight and Accountability Commission within 30 days of BOS approval, and was unaware that the Update was to be submitted to DHCS in addition. • Siskiyou County will submit a copy of the FY20-23 Plan and all future Annual Plans and Updates to DHCS at MHSA@dhcs.ca.gov as well as the OAC within 30 days of BOS approval. 	

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Finding #3:	Siskiyou County did not update the approved FY 2017-20 Plan at least annually. The County did not complete a FY 2018-19 Update to the FY 2017-20 Plan. (Cal. Code Regs., tit. 9, § 3310(c)).	Recommendation #3:	The County must annually update and report any changes made to the Plans in Updates (e.g. program name changes, discontinuation of programs, expansion of programs, updates to program data, changes in program funding, etc.) beginning with the approved FY 2019-20 Update to the FY 2017-20 Plan and each subsequent Update to the Plan thereafter.	The submitted plan is accepted.
Finding #4:	Siskiyou County lacked a narrative analysis that assesses mental health needs of unserved, underserved/inappropriately served and fully served County residents who qualify for MHSA services; and its capacity to implement the proposed programs/services in their approved FY 2017-20 Plan. (Cal.Code Regs., tit. 9, § 3650(a)).	Recommendation #4:	<p>The County must incorporate a narrative analysis that assesses the County’s mental health needs, its capacity to implement proposed programs/services and address all components of Cal. Code Regs., tit 9, § 3650(a) in the approved FY 2020-23 Plan and each subsequent Plan thereafter.</p> <ul style="list-style-type: none"> • Siskiyou County will incorporate narrative analysis that assesses the County’s mental health 	The submitted plan is accepted.

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		Recommendation #4a:	<p>needs and capacity to implement proposed programs/services in all future Plans and Annual Updates.</p> <p>The County should use the results of the assessment to develop the approved Plan</p> <ul style="list-style-type: none"> Siskiyou County will utilize the results of the assessment to develop all future MHSA Plans and Annual Updates. 	
Finding #5:	Siskiyou County's approved FY 2017-20 Plan did not include reports of achievement of performance outcomes for MHSA services. (WIC Section 5848(c); County Performance Contract (6)(A)(5)(d)).	Recommendation #5:	The County must develop and implement policies and procedures to ensure data is collected and analyzed to report on its achievement of performance outcomes for services provided. The approved FY 2020-23 Plan and FY 2019-20 Update, and each subsequent Plan/Update thereafter shall include reports of achievement of performance outcomes for services provided.	The submitted plan is pending.

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		Recommendation #5a:	<ul style="list-style-type: none"> • Siskiyou County will develop and implement policies and procedures to ensure data is collected and analyzed to report performance outcomes in each Annual Update and Plan beginning with the FY 2019-20 Update and including FY 2020-23 Plan. • Siskiyou County will continue to meet with contract providers to discuss outcome measure, required documentation and data that must be collected as outlined in their contract. See attachments including meeting invites titled <i>Finding 5_Provider Training, a-f.</i> <p>The County contracts with service providers shall include achievement goals from the</p>	<i>(DHCS requests identifying date policies and procedures will be developed and implemented)</i>

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			County’s Plan and Updates that apply to each provider’s programs and services. <ul style="list-style-type: none"> Siskiyou County will incorporate achievement goals into all future contracts with providers that apply to each provider’s programs and services. See attachment entitled <i>Provider Contract</i> in folder <i>Finding #5</i> 	
Finding #6:	Siskiyou County did not dedicate at least 51% of their Prevention and Early Intervention (PEI) funds to serve individuals 25 years old or younger. (Cal. Code of Regs., tit. 9, § 3706(b)).	Recommendation #6:	The County must develop and implement accounting and cost allocation policies and procedures that will allow the County to allocate a majority of PEI funds to serve individuals who are 25 years old or younger. <ul style="list-style-type: none"> The County will develop and implement account and cost allocation policies and procedures that will allow the County to track and allocate a majority of PEI 	The submitted plan is accepted.

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			funds to serve individuals who are 25 years old or younger. Policies will be developed and implemented by May 1, 2020. In FY 17/18 as reported on the ARER, the County spent 95.66% of PEI funds on youth 25 years old and younger.	
Suggested Improvement Item #1:	MHSA Transparency and Consistency	Suggested Improvement #1: Suggested Improvement #1a	<p>DHCS recommends the County post the full ARER on the County's website; and not just the summary page.</p> <ul style="list-style-type: none"> The County will post all future ARERs on the County's website in their entirety. <p>DHCS recommends the County provide detailed MHSA program narratives in the approved Plan and Update by component with concrete examples of program descriptions, summaries, goals and/or activities, as well as</p>	The submitted plan is accepted.

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		Suggested Improvement #1b	<p>document any changes made to the approved Plan in subsequent Updates.</p> <ul style="list-style-type: none"> • Siskiyou County will provide detailed program narratives with examples of descriptions, summaries and goals, as well as documenting any changes made for all future Plans and Annual Updates. <p>DHCS recommends the County’s MHPA program names detailed in the approved Plan, Update and ARER must match; and programs placed in the correct component based on regulations.</p> <ul style="list-style-type: none"> • County MHPA program names detailed in the approved Plan, Update and ARER will match in all future Plans and Annual Updates. All future planned programs will be 	

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		Suggested Improvement #1c	<p>placed in the correct component based on regulations.</p> <p>The ARER should be consistent with the budget in the Plan and Update. If the program or service did not occur, still report the program or service on the ARER and indicate zero expenditures.</p> <p>The County will ensure that all future ARERs are consistent with the budget in Plans and Annual Updates. If programs or services did not occur, they will still be reported in the ARER with zero expenditures noted.</p>	
Suggested Improvement Item #2:	Community Program Planning Process (CPPP)	Suggested Improvement #2:	DHCS recommends the County incorporate all aspects of the current CPPP into formalized written policies and procedures. This includes CPPP designated positions, staff training, stakeholder training, client and stakeholder outreach and involvement.	The submitted plan is accepted.

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		Suggested Improvement #2a	<ul style="list-style-type: none"> • Siskiyou County will implement written policies and procedures that include CPPP designated training and stakeholder outreach and involvement. See attachment entitled <i>Item 2 CPPP policy</i>. <p>DHCS recommends the County design a template for sign-in sheets that specify date, time, location, purpose of the meeting and identify the constituent group stakeholders represent, as well as record meeting minutes for all stakeholder meetings. Additionally, DHCS recommends all CPPP training materials include date trainings occur and the corresponding sign-in sheet(s).</p> <ul style="list-style-type: none"> • County utilizes sign in sheets (see attachment entitled <i>Item 2a SIGN IN SHEET</i>) that specify date, location, purpose of the meeting and identify the 	

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			<p>constituent group stakeholders represent. The County will update sign in sheet to include time of meeting, will ensure minutes are taken at all future CPPP meetings, and that CPPP training materials include date trainings occur and corresponding sign-in sheets.</p>	

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Suggested Improvement Item #3:	MHSA Policies, Procedures, Evaluation and Training	Suggested Improvement #3:	<p>DHCS recommends the County develop and implement a MHSA training program and identify processes and supports including:</p> <ul style="list-style-type: none"> a) Policies and procedures that incorporate MHSA general principles. b) Requirements and components (CPPP, CSS (FSP/GSD/O&E), PEI, INN, WET, CFTN). c) Funding and reporting requirements. d) Plans and Updates e) Other needs such as staffing, performance objectives and outcomes. <ul style="list-style-type: none"> • The County will develop and implement a MHSA training program. Contracted providers will receive training 	The submitted plan is accepted.

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			<p>annually, and County staff will receive training upon hire and monthly thereafter during All Staff meetings. Training will include the following:</p> <ul style="list-style-type: none"> • Siskiyou County has developed policies for MHPA general principles. See attachments in folder entitled Suggested Improvement>Item#3> SI#3. The County will finalize, implement and initiate staff training on policies by March 31, 2020. • Siskiyou County has developed policies regarding MHPA requirements and components. The County will finalize, implement and initiate staff training on policies by March 31, 2020. <p>The County will develop policies and procedures regarding</p>	

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		Suggested Improvement #3a	<p>funding and reporting requirements by June 30, 2020 and initiate training of staff and contractors immediately thereafter.</p> <ul style="list-style-type: none"> • The County will train staff on the FY 20/23 Plan and all Plans and Updates thereafter. • Staff will receive training on performance objectives, outcomes and other relevant topics as appropriate. Training will be incorporated into monthly All Staff meetings beginning in March 2020. <p>The training should also address how the county will evaluate the effectiveness of programs/services they deliver and their on-going quality improvement strategies.</p> <ul style="list-style-type: none"> • The MHSA Coordinator currently reports program 	

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		Suggested Improvement #3b	<p>updates to the Quality Improvement Committee as well as All Staff and providers. See attachment in <i>Suggested Improvement folder Item#3>SI#3a</i>. The County will implement training on evaluation of programs/services, and in collaboration with QI Committee will develop and train on on-going quality improvement strategies. Training shall commence with implementation of the 2020-2023 Plan on July 1, 2020.</p> <p>DHCS recommends MHSA training for all mental health employees and service providers involved in complete delivery of services to recipients of MHSA programs; and documentation of annual training.</p> <ul style="list-style-type: none"> • Siskiyou County provides MHSA orientation and 	

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		Suggested Improvement #3c	<p>ongoing trainings to all County employees. The County will implement monthly MHSA trainings for employees and annual trainings for providers. See attachment in <i>Suggested Improvement folder Item#3>SI#3b</i>. County will provide training for contracted service providers for the 2020-2023 Plan.</p> <p>DHCS recommends MHSA training to all new employees; and documentation of annual training.</p> <ul style="list-style-type: none"> Siskiyou County provides MHSA training/ orientation to all new County employees. See attachment in <i>Suggested Improvement folder Item#3>SI#3c</i>. 	