

**Tuolumne Plan of Correction**  
**Per the County Performance Contract Review Report for Review Date June 23, 2020**

<b>Finding # or Suggested Improvement #</b>	<b>Finding or Suggested Improvement</b>	<b>Recommendation # (State Corrective Action Step / Identify Timeline / and Evidence of Corrections / Mechanisms for Monitoring Effectiveness)</b>		<b>Score – Comments/ Notes</b>
Finding # 1	Tuolumne County's FY 2018-19 Annual Revenue and Expenditure Report (ARER) was not posted on the County's website (California Code of Regulations, title 9, section 3510.010(b)(1); Welfare and Institutions Code section 5899).	Recommendation #1: The County must post their current ARER on their website for the approved FY 2019-20 Annual Update (Update) and all subsequent Updates thereafter.	The County must post their current ARER on their website within 30 days after submittal to DHCS for the approved FY 2019-20 Annual Update (Update) and all subsequent Updates thereafter.  <ul style="list-style-type: none"> <li>a. TCBH will post its current ARER on its website for the approved FY 2019-20 Annual Update and will post all subsequent ARER's thereafter.</li> <li>b. The FY 2019-20 ARER will be completed by 1/31/21 and once complete it will be posted to the TCBH website by 3/31/21. Each subsequent ARER thereafter will be posted to the TCBH website within 30 days after submittal to DHCS.</li> <li>c. A tracking checklist has been created that includes posting each ARER on the TCBH website.</li> </ul> <ul style="list-style-type: none"> <li>• <u>Submit to DHCS immediately:</u> Checklist template</li> <li>• <u>Submit to DHCS immediately after posting ARER:</u> Screenshot of TCBH webpage to show posting of ARER</li> </ul>	The submitted plan is accepted.
Finding #2	Tuolumne County did not submit the approved FY 2018-19 Update to the Department of Health Care Services	Recommendation #2: The County must ensure the approved FY 2020-23 Three-Year Program and Expenditure Plan	The County must ensure the approved FY 2020-23 Three-Year Program and Expenditure Plan (Plan), FY 2019-20 Update and all Plans and Updates thereafter, are submitted to the DHCS within 30 days of adoption by the County Board of Supervisors.	The submitted plan is accepted.

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	(DHCS) within 30 days of adoption by the County Board of Supervisors. (W&I Code section 5847(a)).	(Plan), FY 2019-20 Update and all Plans and Updates thereafter, are submitted to the DHCS within 30 days of adoption by the County Board of Supervisors.	a. The approved FY 2019-20 Update and FY 2020-23 Three-Year Program and Expenditure Plan and all subsequent Plans and Updates thereafter will be submitted to DHCS within 30 days of adoption by the Board of Supervisors.  b. A tracking checklist has been created that includes submittal of MHSA Plans and Updates to the DHCS within 30 days of adoption by the Board of Supervisors.  • <u>Submit to DHCS immediately</u> : Checklist template	
Finding #3	Tuolumne County did not conduct an assessment of its capacity to implement the proposed MHSA programs/services. The assessment must include: the strengths and limitations of the County and service providers that impact their ability to meet the needs of racially and ethnically diverse populations; bilingual proficiency in threshold languages;	Recommendation #3: The County must conduct an assessment of its capacity to implement the proposed programs/services and include all aspects of Cal. Code Regs., tit. 9, §§ 3650(a)(5)(A), 3650(a)(5)(B). The County must also use the results of the assessment to develop the FY 2020-23 Plan and all subsequent Plans thereafter.	The County must conduct an assessment of its capacity to implement the proposed programs/services and include all aspects of Cal. Code Regs., tit. 9, §§ 3650(a)(5)(A), 3650(a)(5)(B). The County must also use the results of the assessment to develop the FY 2020-23 Plan and all subsequent Plans thereafter. a. Edit and finalize DRAFT policy “Assessment of Capacity to Implement Proposed MHSA Program/Services Under CSS Component of the Three-Year Program and Expenditure Plan.” b. Include an assessment of TCBH’s capacity to implement proposed MHSA Program/Services under the CSS component in its 2020-2023 Three-Year	The submitted plan is accepted.

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	and, percentages of diverse cultural, racial/ethnic and linguistic groups represented among direct service providers, as compared to the percentage of the total population needing services and the total population being served. Furthermore, since the County did not conduct an assessment, the results of the assessment were not used to develop the Plan. (Cal. Code Regs., tit. 9, §§ 3650(a)(5), 3650(a)(5)(A), 3650(a)(5)(B)).		<p>Program and Expenditure Plan and for each subsequent Plan thereafter.</p> <ul style="list-style-type: none"> <li>• <u>Submit to DHCS by 7/30/21</u>: Final policy “Assessment of Capacity to Implement Proposed MHSA Program/Services Under CSS Component of the Three-Year Program and Expenditure Plan”</li> <li>• <u>Submit to DHCS by 7/30/21</u>: Approved 2020-2023 Three-Year Program and Expenditure Plan that includes Capacity Assessment</li> </ul>	
Finding #4	Tuolumne County did not ensure all Behavioral Health Worker II staff or otherwise known as the Personal Services	Recommendation #4: The County must ensure all Behavioral Health Worker II staff are educated and trained in linguistic and	The County must ensure all Behavioral Health Worker II staff are educated and trained in linguistic and cultural competence and has knowledge of available resources within the client/family’s racial/ethnic community.	The submitted plan is accepted.

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	Coordinator (PSC), specifically two positions in FY 2018-19, were culturally and linguistically competent or, at a minimum, were educated and trained in linguistic and cultural competence and had knowledge of available resources within the client/family's racial/ethnic community. (Cal. Code Regs., tit. 9, § 3620(h)(2); W&I Section 5600.2)	cultural competence and has knowledge of available resources within the client/family's racial/ethnic community.	<p>a. TCBH will create a Workforce Education and Training policy that states 1) that ALL TCBH staff shall complete mandated trainings including training in linguistic and cultural competence; 2) how training completions are tracked and monitored; 3) designate staff positions such as the WET Coordinator that are responsible for coordination, tracking, and monitoring of trainings.</p> <ul style="list-style-type: none"> <li>• <u>Submit to DHCS by 7/30/21</u>: Final WET policy and proof of linguistic and cultural competence trainings for all FSP Behavioral Health Workers for FY 20/21</li> </ul>	
Finding #5	Tuolumne 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 approved FY 2018-19 Update. (Cal. Code	Recommendation #5: 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	<p>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 approved FY 2020-23 Plan, FY 2019-20 Update and all subsequent Plans and Updates thereafter.</p> <p>a. An estimate of the number of FSP clients to be served in each age group has been included in the Board-approved FY 19/20 MHSA Annual Update (page 18) and will be</p>	The submitted plan is accepted.

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	Regs., tit. 9, § 3650(a)(3); W&I Section 5847(e)).	year in the approved FY 2020-23 Plan, FY 2019-20 Update and all subsequent Plans and Updates thereafter.	included for each year in the FY 2020-23 Plan and all subsequent Plans and Updates.  • <u>Submit to DHCS immediately</u> : FY 19/20 MHSA Annual Update	
Finding #6	Tuolumne County's Community Services and Supports (CSS) programs/services were inconsistent between the approved FY 2018-19 Update and the FY 2018-19 ARER, specifically for the Mobile Crisis Outreach Program, Benefits Development Program, and for Promotion and Community Education Activities. (W&I Section 5892(g); Cal. Code Regs., tit. 9, § 3320(a)).	Recommendation #6: The County must ensure that the program names listed in the CSS component section of the approved FY 2020-23 Plan and FY 2019-20 Update, and all subsequent Plans and Updates thereafter, are consistent with the budget pages and names in the ARER. If the program or service did not occur, report the program or service on the ARER and indicate zero expenditures. Any discrepancies or name changes must be explained in the approved Update.	The County must ensure that the program names listed in the CSS component section of the approved FY 2020-23 Plan and FY 2019-20 Update, and all subsequent Plans and Updates thereafter, are consistent with the budget pages and names in the ARER. If the program or service did not occur, report the program or service on the ARER and indicate zero expenditures. Any discrepancies or name changes must be explained in the approved Update. a. TCBH will ensure that the proposed budget listed in the CSS component, and all components, of the approved FY 2019-20 Update, the approved FY 2020-23 Three-Year Plan, and all subsequent Plans and Updates thereafter, are consistent with budget pages and names in the ARER. If the program or service did not occur, TCBH will report the program or service on the ARER and indicate zero expenditures. TCBH will explain any discrepancies or name changes in approved Updates. b. A tracking checklist template has been created that includes the following:	The submitted plan is accepted.

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			<ol style="list-style-type: none"> <li>1) Checking that all MHSA component program names are consistent with budget names and names in ARER;</li> <li>2) That if a program/service did not occur, it will be reported as zero expenditures in the ARER;</li> <li>3) That any discrepancies or name changes will be explained in approved updates</li> </ol> <ul style="list-style-type: none"> <li>• <u>Submit to DHCS immediately</u>: Checklist template</li> <li>• <u>Submit to DHCS by 7/30/21</u>: Approved FY 2020-23 Three-Year Plan and Approved FY 21-22 Annual Update</li> </ul>	
Finding #7	Tuolumne County did not provide the Annual Prevention and Early Intervention (PEI) Report in the approved FY 2017-20 Plan and FY 2018-19 Update. (Cal. Code Regs., tit. 9, §§ 3560.010, 3560.020).	Recommendation #7: The County must include the Annual PEI Report in the approved FY 2020-23 Plan and FY 2019-20 Update and all subsequent Plans and Updates thereafter.	<p>The County must include the Annual PEI Report in the approved FY 2020-23 Plan and FY 2019-20 Update and all subsequent Plans and Updates thereafter.</p> <ol style="list-style-type: none"> <li>a. TCBH's Board-approved FY 2019-20 MHSA Annual Update includes the Three-Year PEI Evaluation Report (data from FY's 16/17 and 17/18) in Appendix C and the FY 18/19 PEI Annual Report in Appendix D; all subsequent Plans and Updates thereafter will include an Annual PEI Report.</li> </ol> <ul style="list-style-type: none"> <li>• <u>Submit to DHCS immediately</u>: FY 19/20 MHSA Annual Update</li> </ul>	The submitted plan is accepted.

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Finding #8	Tuolumne County did not have at least one of the following PEI programs: Outreach for Increasing Recognition of Early Signs of Mental Illness Program and Access and Linkage to Treatment Program. (Cal. Code Regs., tit. 9, §§ 3705(a), 3705(b); W&I Section 5840).	Recommendation #8: The County must have at least one Outreach for Increasing Recognition of Early Signs of Mental Illness Program and Access and Linkage to Treatment Program in the approved FY 2020-23 Plan and FY 2019-20 Update and all subsequent Plans and Updates thereafter.	The County must have at least one Outreach for Increasing Recognition of Early Signs of Mental Illness Program and Access and Linkage to Treatment Program in the approved FY 2020-23 Plan and FY 2019-20 Update and all subsequent Plans and Updates thereafter. <div><div>1.</div>TCBH will ensure that it has at least one Outreach for Increasing Recognition of Early Signs of Mental Illness Program and at least one Linkage to Treatment Program in the approved FY 2019-20 Update and approved FY 2020-2023 Plan and all subsequent Plans and Updates thereafter.<div><div>2.</div>TCBH does have the two mentioned PEI programs/strategies and has noted these programs in its Board-approved FY 19/20 MHSA Annual Update in the PEI section starting on page 23; all Plans and Updates subsequent to the FY 19/20 MHSA Annual Update, and thereafter, will note these two programs/strategies in the PEI section of the report<div><div>3.</div>TCBH has edited its FY 18-19 Annual PEI Report to note which programs address Outreach for Increasing Recognition of Early Signs of Mental Illness and which programs address Access and Linkage to Treatment. This report is included in Appendix D of the FY 19/20 MHSA Annual Update.</div></div></div>	The submitted plan is accepted.



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			<p>4. Annual PEI Reports subsequent to FY 18/19 and thereafter will indicate which programs are an Outreach for Increasing Recognition of Early Signs of Mental Illness Program and/or an Access and Linkage to Treatment Program.</p> <ul style="list-style-type: none"> <li>• <u>Submit to DHCS immediately</u>: Approved FY 19/20 MHSA Annual Update including FY 18/19 Annual PEI Report</li> <li>• <u>Submit to DHCS by 7/30/21</u>: Approved FY 2020-23 Three-Year Plan and Approved FY 21/22 Annual Update</li> </ul>	
Finding #9	Tuolumne County did not dedicate at least 51% of their PEI funds to serve individuals who are 25 years old or younger. (Cal. Code Regs., tit. 9, § 3706(b); W&I Section 5846).	Recommendation #9: The County must demonstrate that at least 51% of PEI funds are used to serve individuals 25 years old or younger on the FY 2019-20 ARER and each subsequent ARER thereafter. The County must develop and implement accounting and cost allocation policies and procedures that will allow the County to allocate a majority of	<p>The County must demonstrate that at least 51% of PEI funds are used to serve individuals 25 years old or younger on the FY 2019-20 ARER and each subsequent ARER thereafter. 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.</p> <ul style="list-style-type: none"> <li>• TCBH will demonstrate that at least 51% of PEI funds are used to serve individuals 25 years old or younger on the FY 2019-20 ARER and each subsequent ARER thereafter; TCBH's FY 19/20 ARER, and each subsequent ARER thereafter, will reflect the breakdown of PEI funding per program per age group.</li> </ul>	The submitted plan is accepted.



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		PEI funds to serve individuals who are 25 years old or younger.	<ul style="list-style-type: none"> <li>• TCBH has determined the age group breakdown for PEI programs by consulting with PEI contractors and creating a chart showing the breakdown and dollars dedicated to each age group. The chart shows that 59.6% of PEI funds is dedicated to individuals age 25 and under. The chart has been included in the FY 18/19 Annual PEI Report which is in Appendix D (page 23) of the Board-approved 19/20 MHSA Annual Update. The 19/20 MHSA Annual Update also includes this data in a narrative in the PEI section of the report (page 23).</li> <li>• A policy will be created that states that at least 51% of PEI funds will be dedicated to individuals age 25 and under and that the ARER will implement accounting and cost allocation procedures to reflect the breakdown of PEI funding per program per age group. MHSA Coordinator will work with BH and County fiscal staff to implement policy and procedure.</li> <li>• <u>Submit to DHCS immediately</u>: Approved FY 19/20 MHSA Annual Update</li> <li>• <u>Submit to DHCS by 7/30/21</u>: Final policy on PEI funding and ARER accounting and cost allocations</li> </ul>	

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Finding #10	Tuolumne County's Capital Facilities (CF) budget was inconsistent between the approved FY 2018-19 Update and the FY 2018-19 ARER. The County did not list any expenditures in the ARER. (W&I Section 5892(g); Cal. Code Regs., tit. 9, § 3320(a)).	Recommendation #10: The County must ensure the proposed budget listed in the CF component of the approved FY 2020-23 Plan, FY 2019-20 Update, and all subsequent Plans and Updates thereafter, are consistent with the budget pages and names in the ARER. If the program or service did not occur, report the program or service on the ARER and indicate zero expenditures. Any discrepancies or name changes must be explained in the approved Update.	The County must ensure the proposed budget listed in the CF component of the approved FY 2020-23 Plan, FY 2019-20 Update, and all subsequent Plans and Updates thereafter, are consistent with the budget pages and names in the ARER. If the program or service did not occur, report the program or service on the ARER and indicate zero expenditures. Any discrepancies or name changes must be explained in the approved Update. <ul style="list-style-type: none"> <li>a. TCBH will ensure that the proposed budget listed in the Capital Facilities component, and all components, of the approved FY 2019-20 Update, the approved FY 2020-23 Three-Year Plan, and all subsequent Plans and Updates thereafter, are consistent with budget pages and names in the ARER. If the program or service did not occur, TCBH will report the program or service on the ARER and indicate zero expenditures. TCBH will explain any discrepancies or name changes in approved Updates.</li> <li>b. A tracking checklist template has been created that includes the following: <ul style="list-style-type: none"> <li>1) Checking that all MHSA component program names are consistent with budget names and names in ARER;</li> <li>2) That if a program/service did not occur, it will be reported as zero expenditure in the ARER;</li> </ul> </li> </ul>	The submitted plan is accepted.

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			<p>3) That any discrepancies or name changes will be explained in approved updates</p> <ul style="list-style-type: none"> <li>• <u>Submit to DHCS immediately</u>: Checklist template</li> <li>• <u>Submit to DHCS by 7/30/21</u>: Approved FY 2020-23 Three-Year Plan and Approved FY 21-22 Annual Update</li> </ul>	
Suggested Improvement #1	Training on the Community Program Planning Process (CPPP)	Suggested Improvement #1: DHCS recommends the County specify in the CPPP Policy and Procedure (P&P) titled “MHSA Community Program Planning Process” what “as needed” training on the CPPP is for County staff, stakeholders, clients and when appropriate the clients family.	<p>DHCS recommends the County specify in the CPPP Policy and Procedure (P&amp;P) titled “MHSA Community Program Planning Process” what “as needed” training on the CPPP is for County staff, stakeholders, clients and when appropriate the client’s family.</p> <p>a. TCBH will edit and finalize the DRAFT “MHSA Community Program Planning Process” to define “as needed” in regards to training of stakeholders.</p> <ul style="list-style-type: none"> <li>• <u>Submit to DHCS by 6/30/21</u>: Final MHSA Community Program Planning Process Policy</li> </ul>	The submitted plan is accepted.
Suggested Improvement #2	MHSA Transparency and Consistency	Suggested Improvement #2: DHCS recommends the County develop a Workforce Education and Training (WET)	DHCS recommends the County develop a Workforce Education and Training (WET) P&P and include the job title of the staff who act as the WET Coordinator and meet the job specifications set regarding coordinating WET programs, acting	The submitted plan is accepted.

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		P&P and include the job title of the staff who act as the WET Coordinator and meet the job specifications set regarding coordinating WET programs, acting as liaison to the department and incorporating MHSA General Standards.	as liaison to the department and incorporating MHSA General Standards. <ul style="list-style-type: none"> <li>a. TCBH will create a Workforce Education and Training (WET) policy and procedure that includes the above recommendation.</li> <li>• <u>Submit to DHCS by 6/30/21</u>: Final Workforce Education and Training (WET) Policy</li> </ul>	