

**Medi-Cal Behavioral Health Corrective Action Plan (CAP)**

**MODOC**

**Compliance Review Date: 6/4/2024**

**Corrective Action Plan Fiscal Year: 23/24**

**SMHS**

<b>Deficiency Number and Finding</b>	<b>Corrective Action Description and Mechanism for Monitoring</b>	<b>Corrective Action Implementation Date</b>	<b>Evidence of Correction</b>	<b>DHCS Response</b>
<p>1.2.1 - The Plan did not ensure the determinations for ICC and IHBS for children and youth who meet criteria for beneficiary access to SMHS.</p> <p>A verification study identified eight of ten children and youth beneficiary files did not contain evidence of medical necessity</p>	<p>Modoc County Behavioral Health (MCBH) has developed a form for assessing and documenting the need for ICC, IHBS, and TFC. Staff are being trained on use of the form. Once fully implemented, the determination of need for children and youth will be routinely assessed and documented.</p> <p>Ongoing monitoring will be accomplished by adding ICC, IHBS, and TFC determination as a component of the regular</p>	<p>Staff training is planned for 12/05/2024.</p> <p>New hires will be trained as appropriate to their job duties.</p> <p>The process will be fully implemented by 01/30/2025.</p>	<p>A copy of the determination form template has been included with this CAP.</p> <p>After full implementation, MCBH will submit samples of completed forms as evidence of correction.</p>	



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<p>determinations for ICC and IHBS.</p> <p>When the Plan does not determine the need for ICC and IHBS services, children and youth may not receive necessary behavioral health services and resources.</p>	<p>Quality Improvement chart reviews. Any issues will be addressed with staff and monitored by the QIC</p>			
<p>1.2.2 – The Plan did not ensure the provision of TFC services to children and youth.</p> <p>When the Plan does not provide TFC services it may impact the ability to serve youth beneficiaries. Youth</p>	<p>MCBH has added the need for TFC organizational providers and/or families to the Interagency Leadership Team (ILT) agenda. The topic is discussed during monthly ILT meetings to ensure that possible resources are identified.</p> <p>MCBH also conducts quarterly resource training for new foster</p>	<p>Discussion around the need for TFC services is already a part of the monthly ILT meetings.</p> <p>MCBH will conduct outreach at the new foster parent training beginning with the next quarter’s training, January through March 2025.</p>	<p>Samples of the ILT agenda and minutes have been included with the CAP.</p> <p>MCBH will submit evidence of outreach at the foster care training and to the community and</p>	

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<p>in need of TFC services may not receive the treatment needed to adequately address their mental health.</p>	<p>parents and will attempt to recruit TFC families during this training.</p> <p>MCBH is exploring options for publicizing the need for TFC organizational providers and/or families through flyers or advertisements distributed in the community, as well as through request for interest letters to appropriate community organizations.</p>	<p>The community outreach activities will be implemented by 03/31/2025.</p>	<p>providers when implemented.</p>	
<p>1.2.3 – The Plan did not ensure determinations of TFC for child and youth who meet criteria for beneficiary access for SMHS.</p> <p>When the Plan does</p>	<p>MCBH has developed a form for assessing and documenting the need for ICC, IHBS, and TFC. Staff are being trained on use of the form. Once fully implemented, the determination of need for children and youth will be routinely assessed and documented.</p>	<p>Staff training is scheduled for 12/05/2024.</p> <p>New hires will be trained as appropriate to their job duties.</p> <p>The assessment and determination process</p>	<p>A copy of the determination form template has been included with this CAP.</p> <p>After full implementation, MCBH will submit samples of</p>	

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<p>not assess whether eligible beneficiaries need TFC services, it may impact its ability to serve youth beneficiaries. Youth in need of TFC services may not receive the treatment needed to adequately address their mental health.</p>	<p>If it is determined that child could benefit from TFC, MCBH will reach out to administration for TFC provider availability.</p>	<p>will be fully implemented by 01/30/2025.</p>	<p>completed forms as evidence of correction.</p>	
<p>1.4.1 – The Plan did not ensure the certification and recertification of organizational providers that subcontract with the Plan to provide SMHS.</p> <p>The DHCS Provider Monitoring Report</p>	<p>In October 2024, MCBH submitted the overdue recertification transmittals and supporting documentation to DHCS.</p> <p>With the exception of the MCBH clinic self-certification, all outstanding recertifications have been accepted.</p>	<p>12/31/2024</p>	<p>With this CAP, MCBH has included PIMS screenshots as evidence of the recertifications.</p> <p>The email from DHCS regarding the MCBH clinic recertification is also included.</p>	

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<p>revealed five of five provider sites were overdue for re-certification.</p> <p>When the Plan does not certify providers rendering SMHS, the Plan cannot ensure that SMHS is provided by qualified practitioners which may result in poor mental health outcomes for the beneficiaries</p>	<p>The documentation for the MCBH clinic recertification had an error that needs to be resolved. MCBH is in the process of rectifying the issue.</p> <p>MCBH is utilizing a calendar/tickler system to support administrative staff to monitor the certifications to ensure that future recertifications are timely.</p>		<p>MCBH has included a sample of the calendar/tickler system used to track and prompt future recertifications.</p>	
<p>4.2.1 – The Plan did not log any beneficiary calls requesting access to specialty mental health and urgent condition services.</p>	<p>MCBH will conduct quarterly training of staff who answer the phones to ensure that they are aware of how to document all requests for services.</p>	<p>Staff training and provider feedback will be conducted by 01/30/2025; and quarterly thereafter.</p>	<p>MCBH will submit training sign-in sheets that reflect staff participation; and for the after-hours provider, email feedback</p>	

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<p>A verification study revealed that none of five DHCS test calls were logged. Three call requests were made during normal business hours and two call requests were made during after-hours.</p> <p>When the Plan does not track beneficiary SMHS call requests, it may have a detrimental impact on the Plan's ability to ensure that beneficiaries receive services in a timely manner.</p>	<p>MCBH will also utilize feedback from the monthly test calls conducted by a contractor to inform staff and determine any issues.</p> <p>The after-hours provider will be notified of any identified issues; and CAPs may be required for recurring problems.</p> <p>Ongoing monitoring will be accomplished by a quarterly review of the Access Log by QI staff, as well as quarterly monitoring by the QIC.</p>		<p>and any required CAPs as evidence of correction.</p> <p>Test call logs and Access Log documentation verification gathered post-training will also be submitted as evidence.</p>	

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Date: 11/21/2024

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