

MENTAL HEALTH SERVICES ACT (MHSA) PLAN OF CORRECTION (POC)

1.	County/City:	Monterey
2.	POC Submitted for:	MHSA Performance Review
3.	Date of Audit/Performance Review	March 27-29, 2023
4.	Name of Preparer:	
5.	Preparer Contact Email:	
6.	Preparer Contact Telephone:	

	A	B	C	D
#	Finding #	Finding	Recommendation	Action Taken to Correct Finding (Identify Timeline / Evidence of Correction)
7.	1	Monterey County did not address all the components in their assessment of the county's capacity to implement proposed mental health programs and services in the adopted Fiscal Year (FY) 2020-23 Three-Year Program and Expenditure Plan (Plan). (California Code of Regs., Title 9,	The County must include an assessment of its capacity to implement mental health programs and services which addresses and includes all required components in the Plan and each subsequent adopted Plan, thereafter.	<p>Initial Response: The County of Monterey is still reviewing its capacity for including the following for its plan. We will be coordinating our efforts to develop data collection tools with our internal MHSA programs and providers. This work was anticipated to continue thru June 30, 2024.</p> <p>Revised Response 5/6/2024: The County of Monterey Behavioral Health MHSA Coordinator, Shannon Castro, withdraws the initial response and provides the attached reports of current reports of the percentages of diverse cultural, racial/ethnic, and linguistic groups presented among direct</p>

MENTAL HEALTH SERVICES ACT (MHSA) PLAN OF CORRECTION (POC)

	A	B	C	D
#	Finding #	Finding	Recommendation	Action Taken to Correct Finding (Identify Timeline / Evidence of Correction)
		section 3650(a)(5)). While the Plan did include bilingual proficiency in threshold languages, and identification of possible barriers to implementing the proposed programs/services and the strengths and limitations of the county and service providers that impact their ability to meet the needs of racially and ethnically diverse populations, it did not include the percentages of diverse cultural, racial/ethnic and linguistic groups represented among		service providers compared to the percentage of the total population needing services. The County of Monterey Behavioral Health Quality Assurance and Quality Improvement Deputy Director and Program Manager II reviewed Finding #1 further, then identified the required data within the electronic record system, Avatar. The current data is attached. The County of Monterey Behavioral Health’s MHSA team recognizes the requirement for including the 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. And plans to include this data for the FY 2023-24 Annual Update and future MHSA reporting wherein the data is required.

MENTAL HEALTH SERVICES ACT (MHSA) PLAN OF CORRECTION (POC)

	A	B	C	D
#	Finding #	Finding	Recommendation	Action Taken to Correct Finding (Identify Timeline / Evidence of Correction)
		direct service providers, as compared to percentage of the total population needing services and the total population being served. The county provided a hyperlink to the county's Cultural Competency Plan which does address the specific requirements of the Plan per Cal. Code of Regs., tit. 9, § 3650(a)(5). The Cultural Competency Plan, however, cannot be used in lieu of the Plan or Update requirements.		

MENTAL HEALTH SERVICES ACT (MHSA) PLAN OF CORRECTION (POC)

	A	B	C	D
#	Finding #	Finding	Recommendation	Action Taken to Correct Finding (Identify Timeline / Evidence of Correction)
		Specifically, the county's capacity assessment must include all the following for each Plan and subsequent adopted Plan, thereafter: a. The strengths and limitations of the county and service providers that impact their ability to meet the needs of racially and ethnically diverse populations, b. Bilingual proficiency in threshold languages, c. Percentages of diverse cultural, racial/ethnic and		

MENTAL HEALTH SERVICES ACT (MHSA) PLAN OF CORRECTION (POC)

	A	B	C	D
#	Finding #	Finding	Recommendation	Action Taken to Correct Finding (Identify Timeline / Evidence of Correction)
		linguistic groups represented among direct service providers, as compared to percentage of the total population needing services and the total population being served, and d. Identification of possible barriers to implementing the proposed programs/services and methods of addressing these barriers.		
8.	2	Monterey County did not explain how each Access and Linkage to Treatment Program will follow up with the referral to support	The County must explain how individuals, and, as applicable, their parents, caregivers, or other family	Initial Response: Monterey County Behavioral Health provides case management which are services that assist our beneficiaries to access needed medical, educational, social, pre-vocational, vocational, rehabilitative, or other community

MENTAL HEALTH SERVICES ACT (MHSA) PLAN OF CORRECTION (POC)

	A	B	C	D
#	Finding #	Finding	Recommendation	Action Taken to Correct Finding (Identify Timeline / Evidence of Correction)
		<p>engagement in treatment in the adopted FY 2020-23 Plan or FY 2021-22 Annual Update (Update). (Cal. Code Regs., tit. 9, § 3755(h)(5)).</p>	<p>members, will be linked to County mental health services, a primary care provider, or other mental health treatment; and how the Program will follow up with the referral to support engagement in treatment each subsequent adopted Plan and Update, thereafter.</p>	<p>services that are impacted by person’s mental health. Our case management activities include: Communicating and referring and monitoring service delivery to ensure persons in care access to services; monitoring of the person’s progress once they receive access to services; and development of the plan for accessing services. In FY 21-22, our FSP programs delivered 64,889 Units of Case management services to 170 beneficiaries.</p> <p>Revised Response 5/6/2024: MCBH has a policy and procedure specific to Access to Treatment programs that ensure individuals who are screened are referred to the appropriate delivery system. This policy and procedure indicates that ultimately, the Access to Treatment to shall screen and coordinate beneficiary care services with NSMHS and SMHS providers to facilitate care transitions or addition of services, including ensuring that the referral process has been completed, the beneficiary has been connected with a provider, and the new provider accepts the care of the</p>

MENTAL HEALTH SERVICES ACT (MHSA) PLAN OF CORRECTION (POC)

	A	B	C	D
#	Finding #	Finding	Recommendation	Action Taken to Correct Finding (Identify Timeline / Evidence of Correction)
				beneficiary, and medically necessary services have been made available to the beneficiary. This policy and procedure is available now and is attached.
9.	3	Monterey County did not enter into a Full Service Partnership agreement with each client, and when appropriate the client’s family. (Cal. Code Regs., tit. 9, § 3620(e)). The state defines an agreement as a signed agreement between the parties, and Monterey County’s Full Service Partnership agreements did not include signatures.	The county shall enter into a Full Service Partnership agreement between their client, and when appropriate the client’s family, including a signature; and for each subsequent client and client’s family.	<p>Initial Response: Monterey County Behavioral Health has issued a memo to all county staff and its contracted providers indicating that FSP programs must enter into an agreement (signed treatment consent) with each beneficiary (see evidence). Additionally, language related to this required has been added to the SMHS Documentation Guide and the SMHS Program Utilization Review Tool (see evidence provided).</p> <p>Evidence:</p> <ul style="list-style-type: none"> • QI Memo – MHSA FSP Treatment Plan Consent Requirements • Documentation Guide and Utilization Review Evidence <p>Revised Response 5/6/2024: Monterey County Behavioral Health will update existing Policy 131 Full Service Partnership to include that signature</p>

MENTAL HEALTH SERVICES ACT (MHSA) PLAN OF CORRECTION (POC)

	A	B	C	D
#	Finding #	Finding	Recommendation	Action Taken to Correct Finding (Identify Timeline / Evidence of Correction)
				from the beneficiary must be present on the beneficiaries care plan, signifying agreement to an FSP partnership. This policy will be reviewed by the Quality Improvement Committee and submitted by April 1st, 2024 as evidence. A copy of the policy is attached.

MENTAL HEALTH SERVICES ACT (MHSA) PLAN OF CORRECTION (POC)

Instructions: Complete the MHSA Plan of Correction (POC) to address Findings from the Fiscal Audit Report or Performance Review Report.

Row 1: Enter County/City name.

Row 2: Select from the drop down menu if this POC is submitted in response to a Fiscal Audit or a Performance Review.

Row 3: Enter the date that the Fiscal Audit or Performance Review was conducted.

Row 4: Enter the name of the person who prepared the Plan of Correction or is responsible for responding to inquiries about the Plan of Correction.

Row 5: Enter the contact email address of the person who prepared the Plan of Correction or is responsible for responding to inquiries about the Plan of Correction.

Row 6: Enter the contact telephone number of the person who prepared the Plan of Correction or is responsible for responding to inquiries about the Plan of Correction.

Rows 7-28, Column A: Enter the number of the specific Finding from the Fiscal Audit Report or Performance Review Report.

Rows 7-28, Column B: Enter the specific Finding from the Fiscal Audit Report or Performance Review Report.

Rows 7-28, Column C: Enter the specific recommendation from the Fiscal Audit Report or Performance Review Report.

Rows 7-28, Column D: Enter the description of the actions taken to correct the Finding. Must include 1) timeline for implementation and/or completion of actions; 2) proposed (or actual) evidence of correction to be submitted to DHCS.

This completed form must be submitted to MHSA@dhcs.ca.gov.