

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

1.	County/City:	Santa Clara County
2.	POC Submitted for:	MHSA Performance Review
3.	Date of Audit/Performance Review	May 13, 2024
4.	Name of Preparer:	
5.	Preparer Contact Email:	
6.	Preparer Contact Telephone:	

#	Finding #	Finding	Recommendation	Action Taken to Correct Finding (Identify Timeline / Evidence of Correction)
7.	1	Santa Clara County did not include documentation of achievement in performance outcomes for Community Services and Support (CSS), Prevention, and Early Intervention (PEI) and Innovation (INN) programs in the adopted Fiscal Year (FY) 2020-23 Three-Year Program and Expenditure Plan (Plan). The County included documentation of achievement in performance outcomes for CSS and INN in the FY 2022-23	The County must include documentation of achievement in performance outcomes for CSS, PEI, and INN programs in each subsequent adopted Plan and Update thereafter.	<p>SCC BHSD Response:</p> <p>The approved FYs 2022-2023 Update, 2023-2026 Three-Year Program and Expenditure Plan and the posted FY2024-25 Annual Update include this analysis within the CSS, PEI and INN sections of the Annual Program Updates. Please refer to the following pages in the attached plans:</p> <ul style="list-style-type: none"> FY 2022-2023 Update: CSS starting page 33; PEI

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		Annual Update (Update). (County Performance Contract (6.)(A.)(5)(d.); Welfare and Institution Code (W&I Code) section 5848).		<p>starting page 78; INN starting page 550</p> <ul style="list-style-type: none"> • FY 2023-26 Three-Year Program and Expenditure Plan: CSS starting page 81; PEI starting page 458; INN starting page 882 • FY 2024-2025 Update: CSS starting page 58; PEI starting page 498; INN starting page 918 <p>Starting with the FY 2025-26 Annual Update, Santa Clara County (SCC) Behavioral Health Services Department (BHSD) will clearly label the CSS, PEI and INN component sections of the Plan or Update in the table of contents and ensure that this information is included within this section. Santa Clara County submitted their updated MHSA</p>

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				Policy & Procedures to DHCS in 2023 and will submit the FY 25-26 Annual Update by June 30, 2025.
8.	2	Santa Clara County did not summarize and analyze the recommended revisions received during the 30-day public comment period in either the adopted FY 2020-23 Plan or FY 2022-23 Update. (W&I Code section 5848(b); California Code of Regulations (Cal. Code Regs.), title 9, section 3315(a)(3); Mental Health Services Oversight & Accountability Commission (MHSAOAC) FY 2015-2016 MHSA Annual Update Instructions (pg. 3)).	The County must summarize and analyze the recommended revisions received during the 30-day public comment period in each subsequent adopted Plan and Update thereafter	<p>SCC BHSD Response:</p> <p>For the FY 2020-23 Plan and FY 2022-23 Update, Santa Clara County (SCC) Behavioral Health Services Department (BHSD) analyzed and provided responses to each public comment received during the 30-day public comment period. Detailed responses can be found:</p> <ul style="list-style-type: none"> • FY 2020-23 Plan: starting on page 280 • FY 2022-23 Update: starting on page 750

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				Starting with the FY 2025-26 Annual Update, SCC BHSD will ensure that future Plans and Annual Updates summarize this information within the Community Program Planning Process section of the plan document. Santa Clara County will update their MHSA Policy & Procedures to reflect this and submit to DHCS by August 30, 2025. Santa Clara County will submit the FY 25-26 Annual Update by June 30, 2025.
9.	2a	Santa Clara County did not include any substantive written recommendations for revisions received during the 30 day comment period in either the adopted FY 2020-23 Plan or FY 2022-23 Update. (W&I Code section 5848(b)).	The County must include a description of any substantive changes made to each subsequent adopted Plan and Update thereafter that was circulated. If no changes made, identify no changes made in the adopted Plan or Update.	SCC BHSD Response: For the FY 2020-23 Plan and FY 2022-23 Update, Santa Clara County (SCC) Behavioral Health Services Department (BHSD) analyzed and provided responses to each public

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				<p>comment received during the 30-day public comment period. Modifications to the plans were shared with the public as noted in the BHSD response on page 289 of the attached FY2020-23 Plan.</p> <p>BHSD did not receive substantive recommendations for revision for the FY2022-23 Update.</p> <p>In the approved FY2024-25 Update, BHSD noted changes made to the Update (see page 23). Starting with the FY 2025-26 Update, SCC BHSD will continue to note changes, as applicable, in future Plans and Annual Updates. Santa Clara County submitted their updated MHSA Policy & Procedures to DHCS in</p>

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				2023 and will submit the FY 25-26 Annual Update by June 30, 2025.
10.	3	Santa Clara County included a narrative analysis of the mental health needs of unserved, underserved/ inappropriately served, and fully served County residents who qualify for MHSA service in the adopted FY 2020-23 Plan. However, the analysis did not identify the number of children (age 0-17 yrs), transition-aged youth (TAY) (16-25 yrs), adult (18-59 yrs), and older adults (60+ yrs) by gender, race/ethnicity, and primary language in the narrative analysis in the adopted FY 2020-23 Plan. (Cal. Code Regs., tit. 9, § 3650(a)(1)(A)).	The County must identify the number of children (age 0-17 yrs), TAY (16-25 yrs), adult (18-59 yrs), and older adults (60+ yrs) by gender, race/ethnicity, and primary language in the narrative analysis in each subsequent adopted Plan thereafter.	<p>SCC BHSD Response:</p> <p>The approved FYs 2023-2026 Three-Year Program and Expenditure Plan and the posted FY2024-25 Annual Update include this analysis.</p> <p>SCC BHSD will ensure that future Plans and Annual Updates include this information, as outlined in the attached MHSA Policy & Procedure.</p> <p>As evidence of compliance, SCC BHSD has included a copy of the final approved FYs 23-26 Three-Year Program and Expenditure Plan.</p>

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				Please refer to the analysis starting on page 6 of the Plan. The posted FY 2024-25 Annual Update is also included as evidence; please refer to the analysis starting on page 5 of the Update. Santa Clara County will submit the FY 25-26 Annual Update with this information by June 30, 2025.
11.	4	Santa Clara County did not include an assessment of the County's capacity to implement mental health programs and services in the adopted FY 2020-23 Plan. (Cal. Code Regs., tit. 9, § 3650(a)(5)).	<p>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 adopted Plan and each subsequent adopted Plan, thereafter.</p> <p>a) The strengths and limitations of the County and service providers that impact their</p>	<p>SCC BHSD Response:</p> <p>The approved FYs 2023-2026 Three-Year Program and Expenditure Plan and the posted FY2024-25 Annual Update include this analysis.</p> <p>SCC BHSD will ensure that future Plans and Annual Updates include this information, as outlined in the attached MHSA Policy & Procedure.</p>

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			<p>ability to meet the needs of racially and ethnically diverse populations.</p> <p>b) The evaluation should include an assessment of bilingual proficiency in threshold languages.</p> <p>c) Percentages of diverse cultural, racial/ethnic, and linguistic groups represented among direct service providers, as compared to percentage of the total population needing services and the total population being served.</p> <p>d) Identification of possible barriers to implementing the proposed programs/services and methods of addressing these barriers.</p>	<p>As evidence of compliance, SCC BHSD has included a copy of the final approved FYs 23-26 Three-Year Program and Expenditure Plan. Please refer to the findings report starting on page 926 of the Plan. The posted FY 2024-25 Annual Update is also included as evidence; please refer to the findings report starting on page 1173 of the Update. Santa Clara County will submit the FY 25-26 Annual Update with this information by June 30, 2025.</p>

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12.	5	<p>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 of the adopted FY 2020-23 Plan. The County did include the estimated number of clients, in each age group, to be served in the FSP category for FY 2021; however, not for FY 2022 and FY 2023. (Cal. Code Regs., tit. 9, § 3650(a)(3)).</p>	<p>The County must provide an estimate of the number of clients, in each age group, to be served in the FSP service category for each fiscal year of the adopted Plan, in each subsequent adopted Plan thereafter.</p>	<p>SCC BHSD Response:</p> <p>The approved FYs 2023-2026 Three-Year Program and Expenditure Plan and the posted FY2024-25 Annual Update include this analysis. The FY 2023-2026 Three-Year Program and Expenditure Plan lists the information for all three years of the Plan.</p> <p>SCC BHSD will ensure that future Plans and Annual Updates include this information.</p> <p>As evidence of compliance, SCC BHSD has included a copy of the final approved FYs 23-26 Three-Year Program and Expenditure Plan. Please refer to page 24 of the Plan. The posted FY 2024-25 Annual Update is also included</p>

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				as evidence; please refer to the findings report starting on page 24 of the Update. Santa Clara County will revise their MHSA Policy & Procedures to ensure these requirements will be performed on an ongoing basis by August 30, 2025. Santa Clara County will submit the FY 25-26 Annual Update with this information by June 30, 2025 and ensure that future plans after the FY25-26 Annual Update have the source data clearly noted.
13.	6	Santa Clara County did not indicate the number of children, TAY, adults, and older adults to be served, and did not provide the cost per person for CSS, PEI, and INN, in the adopted FY 2020-23 Plan. The County did include the number of children,	The County must indicate the number of children, transition-aged youth, adults, and older adults to be served, and indicate the cost per person for CSS, PEI, and INN for each FY, in each subsequent adopted Plan and Update thereafter.	<p>SCC BHSD Response:</p> <p>The approved FY 2023-2026 Three-Year Program and Expenditure Plan and the posted FY2024-25 Annual Update include this analysis. The FY 2023-2026 Three-Year Program</p>

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		TAY, adults, older adults to be served and cost per person for FY 2021 in the adopted Plan; however, not for FY 2022 and FY 2023. (W&I Code section 5847(e)).		<p>and Expenditure Plan lists the information for all three years of the Plan.</p> <p>SCC BHSD will ensure that future Plans and Annual Updates include this information.</p> <p>As evidence of compliance, SCC BHSD has included a copy of the final approved FYs 23-26 Three-Year Program and Expenditure Plan. Please refer to page 24 of the Plan. The posted FY 2024-25 Annual Update is also included as evidence; please refer to the findings report starting on page 24 of the Update. Santa Clara County will revise their MHSA Policy & Procedures to ensure these requirements will be performed on an ongoing basis by August 30, 2025. Santa Clara</p>

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				County will submit the FY 25-26 Annual Update with this information by June 30, 2025 and ensure that future plans after the FY25-26 Annual Update have the source data clearly noted.
14.	7	<p>Santa Clara County did not include a description of each PEI program in the PEI component of the adopted FY 2020-23 Plan and FY 2022-23 Update:</p> <ul style="list-style-type: none"> • Early Intervention Program • Outreach for Increasing Recognition of Early Signs of Mental Illness Program • Prevention Program • Stigma and Discrimination Reduction Program • Access and Linkage to Treatment Program • Suicide Prevention Program (optional) 	<p>The County must include a description of each PEI program in the PEI component: Early Intervention program, Outreach for Increasing, Recognition of Early Signs of Mental Illness program, Prevention program, Stigma and Discrimination Reduction program and Access to Linkage to Treatment program in each subsequent adopted Plan and Update thereafter.</p>	<p>SCC BHSD Response:</p> <p>The approved FYs 2022-2023 Update, 2023-2026 Three-Year Program and Expenditure Plan and the posted FY2024-25 Annual Update include this analysis within the PEI Annual Program Updates section. Please refer to the following pages in the attached plans:</p> <ul style="list-style-type: none"> • FY 2022-2023 Update: starting page 78

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		(W&I Code section 5840; Cal. Code Regs., tit. 9, §§ 3705(a-b), 3755).		<ul style="list-style-type: none"> FY 2023-26 Three-Year Program and Expenditure Plan: starting page 458 FY 2024-2025 Update: starting page 498 <p>In future plans, SCC BHSD will clearly label the PEI component section of the Plan or Update in the table of contents and ensure that this information is included within this section. Santa Clara County will revise their MHSA Policy & Procedures to ensure these requirements will be performed on an ongoing basis by August 30, 2025.</p>
15.	8	Santa Clara County did not include in the adopted FY 2020-23 Plan and FY 2022-23 Update, specify for each Stigma and Discrimination Reduction program, the methods, and	The County must specify the methods and activities to be used to change attitudes, knowledge, and/or behavior regarding being diagnosed with mental illness, having mental	<p>SCC BHSD Response:</p> <p>The approved FYs 2022-2023 Update, 2023-2026 Three-Year Program and Expenditure Plan and the posted FY2024-25</p>

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		activities to be used to change attitudes, knowledge, and/or behavior regarding being diagnosed with mental illness, having mental illness and/or seeking mental health services (see Finding #7 above). (Cal. Code Regs., tit. 9, § 3755(f)(3)).	illness and/or seeking mental health services in each subsequent adopted Plan and Update thereafter.	Annual Update include this analysis within the PEI Annual Program Updates section. Please refer to the following pages in the attached plans: <ul style="list-style-type: none"> • FY 2022-2023 Update: starting page 253 • FY 2023-26 Three-Year Program and Expenditure Plan: starting page 659 • FY 2024-2025 Update: starting page 690 In future plans, SCC BHSD will clearly label the PEI component section of the Plan or Update in the table of contents and ensure that this information is included within this section. Santa Clara County submitted their updated MHSA Policy & Procedures to DHCS in 2023 and will submit

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				the FY 25-26 Annual Update with this information by June 30, 2025.
16.	9	Santa Clara County did not include in the adopted FY 2020-23 Plan and FY 2022-23 Update, an explanation for each Access and Linkage to Treatment program, how individuals, and, as applicable, their parents, caregivers, or other family members, will be linked to county mental health services, a primary care provider, or other mental health treatment in the adopted Plan/Update; and how the program will follow up with the referral to support engagement in treatment in the adopted FY 2020-23 Plan (see Finding #7 above). (Cal. Code	The County must explain how individuals, and, as applicable, their parents, caregivers, or other family members, will be linked to County mental health services, a primary care provider, or other mental health treatment for each Access and Linkage to Treatment Program; and how the program will follow up with the referral to support engagement in treatment in each subsequent adopted Plan and Update thereafter.	<p>SCC BHSD Response:</p> <p>The approved FYs 2022-2023 Update, 2023-2026 Three-Year Program and Expenditure Plan and the posted FY2024-25 Annual Update include this analysis within the PEI Annual Program Updates section. Please refer to the following pages in the attached plans:</p> <ul style="list-style-type: none"> • FY 2022-2023 Update: starting page 307 • FY 2023-26 Three-Year Program and Expenditure Plan: starting page 693 • FY 2024-2025 Update: starting page 722

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		Regs., tit. 9, §§ 3755(h)(4), 3755(h)(5)).		Starting with the FY 2025-26 Update, SCC BHSD will clearly label the PEI component section of the Plan or Update in the table of contents and ensure that this information is included within this section. Santa Clara County will revise their MHSA Policy & Procedures to ensure these requirements will be performed on an ongoing basis by August 30, 2025. Santa Clara County will submit the FY 25-26 Annual Update with this information by June 30, 2025.
17.	10	Santa Clara County did not include a description in the adopted FY 2020- 23 Plan and FY 2022-23 Update of involvement by community stakeholders in all phases of each new INN project, including	The County must ensure that it involves community stakeholders meaningfully in all phases of each new INN project, including evaluation of the project and decision making regarding whether to continue	SCC BHSD Response: There were no new INN projects created during the community program planning process of the FY 2020-23 Plan.

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		<p>evaluation of the project and decision making regarding whether to continue the INN project or elements of the project without INN. (Cal. Code Regs., tit. 9, § 3930(b)(2)).</p>	<p>the INN project or elements of the project without INN funds in each subsequent adopted Plan and Update thereafter.</p>	<p>Stakeholders were integrally involved in the planning processes of multiple INN projects from June 2020 to May 2021 (INN 14, 15 and 16). Details about stakeholder engagement and involved can be found in the attached INN project documents.</p> <p>Evidence of stakeholder engagement for INN programs can be found on pages 609 and 684 of the approved FY 2022-23 Update as part of stakeholder presentations. Details on new INN projects can be found on the following pages in the attached FY 2022-23 Update:</p> <ul style="list-style-type: none"> • INN 14: page 559 • INN 15: page 561 • INN 16: page 564

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				Starting with the FY 2025-26 Update, SCC BHSD will clearly label the INN component section of the Plan or Update in the table of contents and ensure that this information is included within this section for future Plans and Updates. Santa Clara County will revise their MHSA Policy & Procedures to ensure these requirements will be performed on an ongoing basis by August 30, 2025. Santa Clara County will submit the FY 25-26 Annual Update with this information by June 30, 2025.
18.	11	Santa Clara County did not ensure that all Personal Service Coordinator (PSC)/Case Managers were culturally and linguistically competent or, at a minimum, educated and trained in linguistic and cultural	The County must ensure that all PSC/Case Managers are culturally and linguistically competent or, at a minimum, are educated and trained in linguistic and cultural competence and had knowledge	SCC BHSD Response: The attached BHSD "Cultural Competency and Non-Discrimination" policy outlines training requirements that BHSD ensures in cultural competency

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		competence and had knowledge of available resources within the client/family’s racial/ethnic community. The County did not provide sufficient evidence to demonstrate that all PSC/Case Managers were trained in linguistic and cultural competence; only one PSC was confirmed to be trained. (Cal. Code Regs., tit. 9, § 3620(h)(2); W&I Code Section 5600.2).	of available resources within the client/family’s racial/ethnic community.	for all direct/clinical service staff of the County and its contracted agencies. Going forward, SCC BHSD will ensure all PSC/Case Managers are trained in linguistic and cultural competence and have knowledge of available resources within the client/family’s racial/ethnic community. Santa Clara County will revise their MHSA Policy & Procedures to ensure these requirements will be performed on an ongoing basis by August 30, 2025.

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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.