

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

1.	County/City:	MODOC COUNTY BEHAVIORAL HEALTH
2.	POC Submitted for:	MHSA Performance Review
3.	Date of Audit/Performance Review	02/19/2024
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.	Finding #1	Modoc County did not include any substantive written recommendations for revisions received during the 30-day comment period in the adopted Fiscal Year (FY) 2020-23 Three-Year Program and Expenditure Plan (Plan). The County generally described types of comments, discussion, analysis, and result of the discussion.	The County must include any substantive written recommendations for revisions received during the 30-day comment period in each subsequent adopted Plan and Annual Update (Update) thereafter. If no recommendations for revisions received, identify no recommendations received in the Plan or Update. Identify those comments received during 30-day comment period versus	<b>MCBH Response 05/16/24:</b> For the Plan in question, Modoc County Behavioral Health (MCBH) did not receive substantive recommendations for revision.  In the approved FYs 24-26 Three-Year Program and Expenditure Plan, MCBH noted that no recommendations for revision were received. MCBH will continue to make this note, as applicable, in future Plans and Annual Updates.

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		(Welfare and Institution Code (W&I Code) section 5848(b)).	those received during other times. List or aggregate the comments in the Plan and Update narratives or in the appendix.	As evidence of compliance, MCBH has included a copy of the final-approved FYs 24-26 Three-Year Program and Expenditure Plan. The relevant information is highlighted on page 8.
8.	Finding #2	<p>Modoc County did not submit the adopted FY 2020-23 Plan and/or Update within 30 days after adoption. The FY 2022-23 Update was adopted by the County Board of Supervisors (BOS) on October 11, 2022, and submitted to the Department of Health Care Services (DHCS) on November 16, 2022.</p> <p>(W&amp;I Code Section 5847(a)).</p>	The County must submit the adopted Plan and/or Update to DHCS for each subsequent adopted Plan and Update thereafter.	<p><b>MCBH Response 05/16/24:</b> The approved FYs 24-26 Three-Year Program and Expenditure Plan was approved by the County BOS on August 8, 2023. Final certifications were signed, and the final document was submitted to DHCS and the OAC on September 5, 2023, within the 30-day requirement.</p> <p>The delay in meeting the 30-day window is often due to a delay in obtaining the certification signature from the Controller-Auditor, which is only authorized upon BOS approval.</p>

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				<p>MCBH will ensure that in the future, adopted Plans and Annual Updates are final-submitted to DHCS and the OAC within the 30-day window. This timeline will be met by assigning submission to a specific individual, who will track the timeliness.</p> <p>As evidence of compliance, MCBH has included a copy of the submission email for the final-approved FYs 24-26 Three-Year Program and Expenditure Plan.</p>
9.	Finding #3	Modoc County did not include a narrative analysis of the mental health needs of unserved, underserved/ inappropriately served, and fully-served County residents who qualify for MHSA services in the adopted FY 2020-23 Plan.	The County must include a narrative analysis of the mental health needs of unserved, underserved/ inappropriately served, and fully served County residents who qualify for MHSA services for each subsequent adopted Plan thereafter.	<p><b>MCBH Response 05/16/24:</b> The approved FYs 24-26 Three-Year Program and Expenditure Plan and the posted FY 24-25 Annual Update include this analysis.</p> <p>MCBH will ensure that future Plans and Annual Updates include this information. This requirement will be</p>

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		(California Code of Regulations (Cal. Code Regs.), title 9, section § 3650(a)(1)(A)).		met by following a Plan/Annual Update template that includes all required elements.  As evidence of compliance, MCBH has included a copy of the final-approved FYs 24-26 Three-Year Program and Expenditure Plan. Please refer to Appendix B, as well as highlighted language beginning on page 4. The posted FY 24-25 Annual Update is also included as evidence; please refer to Appendix A, as well as highlighted language beginning on page 4.
10	Finding #4	Modoc County did not identify the number of Children, Transition-age youth (TAY), Adult, and Older Adults by gender, race/ethnicity, and primary language in the narrative	The County must include identification on the number of Children, TAY, Adult, and Older Adults by gender, race/ethnicity, and primary language in the narrative analysis of the mental health needs of unserved,	<b>MCBH Response 05/16/24:</b> The approved FYs 24-26 Three-Year Program and Expenditure Plan and the posted FY 24-25 Annual Update include this analysis.

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		analysis (see above finding) of the mental health needs of unserved, underserved/ inappropriately served, and fully served county residents who qualify for MHSA services in the adopted FY 2020-23 Plan. (Cal. Code Regs., tit. 9 § 3650(a)(1)(A)).	underserved/ inappropriately served, and fully served county residents who qualify for MHSA services in each subsequent adopted Plan thereafter.	<p>MCBH will ensure that future Plans and Annual Updates include this information. This requirement will be met by following a Plan/Annual Update template that includes all required elements.</p> <p>As evidence of compliance, MCBH has included a copy of the final-approved FYs 24-26 Three-Year Program and Expenditure Plan. Please refer to Appendix B, as well as highlighted language beginning on page 4. The posted FY 24-25 Annual Update is also included as evidence; please refer to Appendix A, as well as highlighted language beginning on page 4.</p>
11	Finding #5	Modoc County did not provide an estimate of the number of clients, in each age group, to be served in	The County must provide an estimate of the number of clients, in each age group, to be served in the FSP service	<b>MCBH Response 05/16/24:</b> The posted MHSA FY 24/25 Annual Update includes this information.

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		the Full-Service Partnership (FSP) category for each fiscal year of the adopted FY 2020-23 Plan. The county indicated that they estimate to serve twelve clients per month, however, does not clearly identify the clients by age group or for each fiscal year of the Plan. (Cal. Code of Regs., tit. 9, § 3650(a)(3)).	category for each fiscal year of the Plan, in each subsequent adopted Plan thereafter.	MCBH will ensure that Plans and Annual Updates include this information. This requirement will be met by following a Plan/Annual Update template that includes all required elements.  As evidence of compliance, MCBH has included a copy of the posted MHSA FY 24/25 Annual Update. Refer to the information highlighted on page 22.
12	Finding #6	Modoc County did not provide evidence of an FSP Partnership Agreement.  (Cal. Code of Regs., tit. 9, § 3620(e)).	The County shall enter a FSP agreement between their client and when appropriate the client's family, and the Personal Service Coordinator/Case Manager for each client served under the FSP service category for each subsequent client and client's family thereafter. DHCS defines an agreement as a signed agreement between the	<b>MCBH Response 05/16/24:</b> As an attachment to this POC, MCBH has included three (3) samples of the FSP Treatment Plan, which MCBH considers the FSP agreement.

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			client, and when appropriate the client's family, and the Personal Service Coordinator/Case Manager.	
13	Finding #7	<p>Modoc 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 Community Services and Support (CSS), Prevention and Early Intervention (PEI) and Innovation (INN) components in the adopted FY 2020-23 Plan and FY 2022-23 Update.</p> <p>(W&amp;I Code section 5847(e)).</p>	The County must indicate the number of Children, TAY, Adults, and Older Adults to be served, and indicate the cost per person for CSS, PEI, and INN, in each subsequent adopted Plan and Update thereafter.	<p><b>MCBH Response 05/16/24:</b> The approved FYs 24-26 Three-Year Program and Expenditure Plan included the estimated number to be served, as well as the estimated cost per client. MCBH did not include the estimated number to be served by age in the most recent Three-Year Plan.</p> <p>The posted MHSA FY 24/25 Annual Update includes the estimated number to be served by age.</p> <p>MCBH will ensure that Plans and Annual Updates include this information. This requirement will be met by following a Plan/Annual</p>

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				<p>Update template that includes all required elements.</p> <p>As evidence of compliance, MCBH has included a copy of the posted MHSA FY 24/25 Annual Update. Please refer to the information included on pages 23 and 31-33.</p>
14	Finding #8	<p>Modoc County did not include documentation of achievement in performance outcomes for CSS programs in the adopted FY 2020-23 Plan and FY 2022-23 Update. While the County did provide supporting documentation during the review of performance outcomes being identified and tracked, they were not incorporated into the Plan and Update.</p>	<p>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>	<p><b>MCBH Response 05/16/24:</b> The approved FYs 24-26 Three-Year Program and Expenditure Plan and the posted MHSA FY 24/25 Annual Update include outcomes.</p> <p>MCBH will ensure that Plans and Annual Updates include this information. This requirement will be met by following a Plan/Annual Update template that includes all required elements.</p> <p>As evidence of compliance, MCBH has included a copy of the final-</p>



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		(W&I Code section 5848 (c); County Performance Contract (6)(A)(5)(d)).		approved FYs 24-26 Three-Year Program and Expenditure Plan. See the highlighted information on pages 12/13 and 18/19. In addition, the posted MHSA FY 24/25 Annual Update is included as evidence; refer to the highlighted information on pages 12/13 and 20/21.
15	Finding #9	Modoc County did not include a description of each Stigma & Discrimination Reduction program and specify the methods and 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	The County must include a description of each Stigma & Discrimination Reduction program and specify the methods and 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 in each subsequent adopted Plan and Update thereafter.	<b>MCBH Response 05/16/24:</b> Due to the MCBH involvement with the CalMHSA JPA for this program, specific activities related to stigma reduction was not feasible in the previous Three-Year Plan.  Through the FYs 24-26 Three-Year Program and Expenditure Plan, MCBH is launching a locally- controlled Stigma & Discrimination Reduction program. Specific activities and changes in attitudes,

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		<p>services in the adopted FY 2020-23 Plan.</p> <p>(Cal. Code Regs., tit. 9, § 3755(f)(3)).</p>		<p>knowledge, and behaviors will be better tracked.</p> <p>MCBH will ensure that Plans and Annual Updates include this information. This requirement will be met by following a Plan/Annual Update template that includes all required elements.</p> <p>As evidence of compliance, MCBH has included a copy of the posted MHSA FY 24/25 Annual Update. Refer to Appendix B and the highlighted information beginning on page 27.</p>
16	Finding #10	Modoc County did not include an assessment of the county's capacity to implement mental health programs and services in	The County must include an assessment of its capacity to implement mental health programs and services in each subsequent adopted Plan thereafter	<b>MCBH Response 05/16/24:</b> The approved FYs 24-26 Three-Year Program and Expenditure Plan and the posted MHSA FY 24/25 Annual Update include this assessment.

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		<p>the adopted FY 2020-23 Plan.</p> <p>(Cal. Code of Regs., tit. 9, § 3650(a)(5)).</p>		<p>MCBH will ensure that Plans and Annual Updates include this information. This requirement will be met by following a Plan/Annual Update template that includes all required elements.</p> <p>As evidence of compliance, MCBH has included a copy of the final-approved FYs 24-26 Three-Year Program and Expenditure Plan (see page 5) and the posted MHSA FY 24/25 Annual Update (see page 5).</p>

## **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](mailto:MHSA@dhcs.ca.gov).