

Medi-Cal Behavioral Health Corrective Action Plan (CAP)

Merced

Compliance Review Date: 1/11/2024

Corrective Action Plan Fiscal Year: 2023-2024

Deficiency Number and Finding	Corrective Action Description and Mechanism for Monitoring	Corrective Action Implementation Date	Evidence of Correction	DHCS Response
SMHS				
1.2.1 Assessment for the Need of TFC Services: The Plan is required to determine if children and youth who meet beneficiary access criteria for SMHS need Therapeutic Foster Care (TFC). The Plan did not ensure the assessment for the need of TFC services to children and youth who met	05/31/2024 BHRS completed Policy and Procedure 1.J.05 Therapeutic Foster Care	05/30/2024	Please see BHRS Policy and Procedure 1.J.05 Therapeutic Foster Care	

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beneficiary access and medical necessity criteria for SMHS.				
1.2.2 Provision of TFC Services: The Plan is required to provide necessary TFC services for children and youth who meet beneficiary access criteria for SMHS. The Plan did not ensure the provision of TFC services by contracting with TFC providers.	07/01/2024 BHRS is working with the Merced County Human Services Agency to begin the work of contracting with TFC service providers. TFC contracting requires coordination with HSA and BHRS.	07/01/2025		
2.1.1 Referrals and Coordination of Care: The Plan shall ensure that non-urgent appointments with a non-physician mental health care provider occur within ten business days of the request	<ul style="list-style-type: none"> BHRS and MCP Central California Alliance for Health have monthly communication regarding the bidirectional referrals being submitted. Please see attached spreadsheet BHRS is currently in process of revamping 		CCAH_Merced_Closed loop Referral	

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for appointment. The Plan did not ensure coordination of care for Managed Care Organization (MCO) referred beneficiaries to receive non-urgent appointments within ten business days of the request for the appointment.	our intake process in efforts to improve timeliness of appointments BHRS is in process of starting a PIP relating to timeliness of appointments in efforts to improve timeliness of appointments			
4.2.1 SMHS Access Information: The Plan is required to provide a statewide, toll-free telephone number 24 hours a day, seven days per week, that provides information to beneficiaries about how to access SMHS. The Plan did not ensure its 24/7 toll-free telephone number system provided required	<ul style="list-style-type: none"> Test calls are completed monthly by a different BHRS team each month. Starting January 2024 the leadership of the program that will be completing test calls the following month were invited to the test calls workgroup meeting in order to better train/educate internal test callers. BHRS is in the process of implementing a phone tree answering system which will allow callers to 	Phone tree implementation date 09/01/2024	Please see Access Script May 2024	

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<p>information for SMHS access, urgent condition services, and problem resolution processes.</p> <p>The Plan is required to maintain a written log of the initial requests for SMHS from beneficiaries. The Plan did not log all calls requesting SMHS from beneficiaries.</p>	<p>select various options and to be connected to various teams/programs. One such option allows callers to identify if they are existing clients or are initiating services. This will route caller to the 24/7 Access team, which will result in information being provided and initial requests for services being initiated.</p> <ul style="list-style-type: none"> The Access script has been updated as of 05/16/2024 and was provided to all BHRS Access staff 			
<p>4.2.2 Access Call Log: The Plan shall maintain a written log of the initial requests for SMHS from beneficiaries. The requests shall be recorded whether they are made via telephone,</p>	<ul style="list-style-type: none"> BHRS Access staff that work business hours trained the afterhours staff in access process and logging procedure on 11/15/2023 Test calls are completed monthly by a different BHRS team each month. Starting January 2024 	<ul style="list-style-type: none"> Phone tree implementation date 09/01/2024 	<p>Please see 4.2.2 Agenda November 15 2023 regarding training to after hours staff</p>	

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<p>in writing, or in person. The log shall contain the name of the beneficiary, the date of the request, and the initial disposition of the request. Beneficiary calls requesting information about SMHS access and services needed to treat a beneficiary's urgent condition are required to be logged. (CCR, Title 9, section 1810, subdivision 405(f))</p> <p>Plan policy I.D.01, Access to Specialty Mental Health (revised July 9, 2019), describes how the Plan maintains a written log for all initial requests for SMHS.</p>	<p>the leadership of the program that will be completing test calls the following month were invited to the test calls workgroup meeting in order to better train/educate internal test callers.</p> <ul style="list-style-type: none"> • BHRS is in the process of implementing a phone tree answering system which will allow callers to select various options and to be connected to various teams/programs. One such option allows callers to identify if they are existing clients or are initiating services. This will route caller to the 24/7 Access team, which will result in information being provided and initial requests for services being initiated. 			

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request, and the initial disposition of the request.				
6.1.1 Acknowledgement Letters for Appeals: The Plan is required to acknowledge receipt of each grievance, appeal, and request for expedited appeal of Adverse Benefit Determinations to the beneficiary in writing. The Plan did not acknowledge receipt of appeals to beneficiaries in writing. The Plan is required to have procedures to ensure the prompt and equitable resolution of discrimination-related complaints. The Plan did not	05/01/2024 <ul style="list-style-type: none"> BHRS updated the process and procedure for the appeal process to include sending an Appeal Receipt letter Created Appeal Receipt letter Created new tracking system for Appeals 	<ul style="list-style-type: none"> Appeal received letter implemented on 11/09/2023 Appeal process/tracking system updated on 05/01/2024 	<ul style="list-style-type: none"> 6.1.1 Appeal received Letter 6.1.1 NAOBD Appeals Procedure 6.1.1 NOABD Appeals Tracker 	

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maintain procedures to ensure prompt and equitable resolution of discrimination-related grievances.				
6.1.2 Discrimination Grievances: The Plan shall adopt procedures to ensure the prompt and equitable resolution of discrimination-related complaints. The Plan shall not require a beneficiary to file a discrimination grievance with the Plan before filing the complaint directly with the DHCS Office of Civil Rights and the U.S. Department of Health and Human	05/01/2024 <ul style="list-style-type: none"> Policy and Procedure I.C.05 were updated to reflect Discrimination Grievances Non discrimination notices that are posted at all BHRS/Contracted provider sites as part of informing materials/wall posting was updated to include contact information for BHRS Discrimination Grievance Coordinator and DHCS/DHHS information BHRS website was updated to include information about Discrimination Grievances 	<ul style="list-style-type: none"> Policy and Procedure implemented on 03/05/2024 Updated non-discrimination notice implemented on 08/21/2023 Website was updated on 09/25/2023 	<ul style="list-style-type: none"> 6.1.2 Policy and Procedure I.C.05 6.1.2 Updated Non-discrimination Notice 6.1.2 Website screenshots 	

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Services, Office for Civil Rights. (Contract, Exhibit, A, Attachment 12(4)(A)(2))				
7.2.1 False Claims Act: The Plan is required to implement and maintain written policies for all employees containing detailed information regarding the False Claims Act and other federal and state laws and employee whistleblower protection. The Plan did not maintain a False Claims Act written policy that includes information about rights of employees and any contractor or agent	05/01/2024 <ul style="list-style-type: none"> BHRS implemented Policy and Procedure I.A.13 BHRS FWA Prevention, Detection, and Reporting (attached) 	01/05/2024	7.2 BHRS implemented Policy and Procedure I.A.13 BHRS FWA Prevention, Detection, and Reporting (attached)	

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to be protected as whistleblowers.				

Submitted by: Matthew Reed

Date: 7/18/2024

Title: QPM Division Director