

Medi-Cal Behavioral Health Corrective Action Plan (CAP)

Ventura

Compliance Review Date: 10/16/2023

Corrective Action Plan Fiscal Year: FY2023-2024

Deficiency Number and Finding	Corrective Action Description and Mechanism for Monitoring	Corrective Action Implementation Date	Evidence of Correction	DHCS Response
SMHS				
1.2.1 The Plan did not ensure the assessment of children and youth for TFC services.	<ol style="list-style-type: none">1. In collaboration with Child Welfare and Probation, the agencies involved screen for TFC services at the Interagency Placement Committee (IPC) meeting. VCBH's role at IPC is to ensure that youth are receiving all clinically eligible services and are at the appropriate level of care to meet their needs.2. An additional policy is	<ol style="list-style-type: none">1. YF93 Policy – the policy will be updated to reflect current screening practices and will be reviewed by all relevant operations and leadership staff. The updates will be completed by September 30, 2024.	<ol style="list-style-type: none">1. Current YF93 Policy2. IPC Screening Form	

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	attached in the evidence package, policy YF93, which describes how the Plan receives and considers assessments. Please note that an immediate action step is to update this policy to reflect the current state. The updated policy will summarize how VCBH screens individuals for level of care appropriateness, including TFC.			
1.2.2 The Plan did not ensure the provision of TFC services to children and youth.	1. In collaboration with Child Welfare and Probation, the agencies involved screen for TFC services at the Interagency Placement Committee (IPC) meeting. VCBH's role at IPC is to ensure that youth are receiving all clinically eligible services and are at	1. VCBH to continue TFC discussion with ISFC providers 2. Continue Complex Care Capacity Building discussion with AB2083 partnering agencies.	1. Strategies Meeting Agenda – AB2083 partnering agencies – Complex Care Capacity	

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	<p>the appropriate level of care to meet their needs.</p> <p>2. The MHP has continued discussions with FFA contracted providers around the possibility of promoting an ISFC home to TFC. FFAs have noted challenges with identifying resource parents with that skill level and/or interest in that level of care. Since COVID, FFAs have also encountered challenges retaining and recruiting foster homes.</p> <p>3. In partnership with AB2083 agencies, we're exploring TFC as a Placement Continuum for our County's Capacity Building Proposal at Strategies Meetings. In a recent meeting with FFAs, an innovative TFC proposal was presented – TFC as a Professional Foster Parent Model. This TFC proposal would include housing and</p>	<p>3. VCBH intends to develop TFC RFP for FY 25/26.</p>	<p>Building discussion</p> <p>2. TFC Exhibit A (ready to execute when provider is identified)</p> <p>3. Meeting with ISFC providers Casa Pacifica and Aspiranet (11/22/23) and with Seneca (3/11/24)</p>	

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	<p>cost of living expenses for a full-time TFC parent.</p> <p>4. The MHP will also be working on developing an RFP for TFC services. The scope of work for the TFC contract has been drafted and is ready to execute once a provider has been identified.</p> <p>5. Additional note to illustrate difficulties with implementing TFC in Ventura County: In recent discussions with other counties, program leads have shared that TFC has been challenging to implement. Additionally, Seneca (current Ventura County CBO and prospective TFC provider) have noted that they recently terminated TFC services in three large counties due to program complexity and challenges</p>			

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	recruiting resource parents with appropriate skill level.			
5.1.1 The Plan did not review prior authorizations within five business days of the Plan's receipt of information necessary to make a determination.	<p>Since the time of data submission and review, changes have already been made to the TBS/IHBS referral, tracking, and communication workflows to improve the time to process prior authorization requests.</p> <ol style="list-style-type: none"> 1. A DocuSign process has been implemented to facilitate immediate signing and approval of TBS/IHBS referrals. 2. The implementation of the new EHR system, SmartCare, in July 2023 has also created efficiencies in documentation sharing. 3. A new training process has been developed to familiarize clinicians with the method of 	<p>1. In March 2023, the DocuSign process was implemented. For ongoing monitoring, a log is maintained to monitor receipt, review and outcome of the referrals. Since implementing this DocuSign process, nearly all referrals have been reviewed within 5 business days. By October 2024, the department aims for 95% of all referrals to be reviewed in 5 business days.</p>	<ol style="list-style-type: none"> 1. TBS and IHBS Training Materials 2. DocuSign for TBS Referrals and Extensions 3. TBS Care Coordination Log example 	

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	initiating referrals to IHBS/TBS, the criteria to be met for this level of care, and the type of services provided for clients who are enrolled in TBS/IHBS. This effort has improved communication and care coordination between entities, thereby reducing the time to process referrals.	<p>2. The new EHR was implemented in July 2023. The review documents are accessed by TBS/IHBS providers directly via the EHR in place of document sharing via email. This allows for easier access to materials for all staff involved in the care of an individual. Any issues with access to documents in the EHR are communicated with both the referring clinic and with the EHR IT team.</p> <p>3. Starting March 2023, training sessions were conducted for</p>		

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		staff at all referring clinics. This series of trainings resulted in the improved quality and completeness of the referral documents. To ensure that existing and new staff are kept up to date with TBS/IHBS program processes, an onboarding training is being developed and will be implemented before August 2024.		

Submitted by: Ventura County MHP

Date: 6/12/2024



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(signature endorsement in previous copy)