

Medi-Cal Behavioral Health Corrective Action Plan (CAP)

SAN BERNARDINO

Compliance Review Date: 9/9/2025

Corrective Action Plan Fiscal Year: 2025 -2026

SMHS

Deficiency Number and Finding	Corrective Action Description and Mechanism for Monitoring	Corrective Action Implementation Date	Evidence of Correction	DHCS Response
<p>2.1.1 Managed Care Plan Referral Care Coordination</p> <p>The Plan did not coordinate care with MCPs to ensure the referral loop was closed by confirming medically necessary services were made available to members.</p> <p>Plan’s policy QM6059 stated</p>	<p>To ensure compliance with BHIN 25-020, which supersedes BHIN 22-065, DBH will request follow up information for referrals sent to managed care plans to confirm that medically necessary services have been made available to members.</p> <p>All inquiries received from each MCP are logged for tracking care coordination efficiency. Tracking logs have evolved on an ongoing basis to align with CalAIM principles and based on collaborative discussions with</p>	<p>The DBH Chief Quality Management Officer will make a formal request to each managed care plan to add “close the loop” discussion to the agenda by the next quarterly Joint Operations Meetings.</p> <p>The next Joint Operations Meetings are scheduled for May 4, 2026, (Molina Healthcare), May 20,</p>	<p>Quality Management Quarterly Forum Agenda and training material.</p> <p>Molina Healthcare 2025 Referral Report.</p> <p>Joint Operations Meeting agendas and minutes.</p> <p>25/26 Quality Improvement</p>	



Deficiency Number and Finding	Corrective Action Description and Mechanism for Monitoring	Corrective Action Implementation Date	Evidence of Correction	DHCS Response
<p>MHPs shall coordinate member care services with MCPs, ensuring the referral process has been completed and medically necessary services have been made available to the member. However, the Plan did not ensure that the referral process was completed and medically necessary services were made available to the member.</p> <p>In a verification study, nine out of ten samples demonstrated that the Plan referred</p>	<p>our Managed Care Plans and are updated accordingly.</p> <p>The DBH Chief Quality Management Officer will ensure each MCP adds discussion of “close the loop” on referrals as a standing agenda item at the quarterly Joint Operations Meetings.</p> <p>The next Joint Operations Meetings are scheduled for:</p> <ul style="list-style-type: none"> • May 4, 2026: Molina Healthcare • May 20, 2026: Kaiser Permanente • June 3, 2026: Inland Empire Health Plan (IEHP) <p>On January 15, 2026, DBH met with IEHP to discuss improved communication and processes to determine referral outcomes.</p>	<p>2026, (Kaiser Permanente), and June 3, 2026 (Inland Empire Health Plan).</p> <p>Quality Management Division, Managed Care Coordination Unit, has formally tracked inquiries since January 2023.</p> <p>Quality Management Division, Access Unit, has formally tracked inquiries since June 2025.</p> <p>January 22, 2026: Molina Healthcare provided DBH a 2025 report with outcomes of all referrals submitted to Molina</p>	<p>Performance Plan Evaluation and new plan.</p> <p>Care Coordination Inquiry Logs</p> <p>Timely Access Form</p> <p>Screening Tool End of Month Reports</p> <p>Screening Tool Disposition Form Timeline Process</p> <p>Updated MCP MOU Contracts</p>	



Deficiency Number and Finding	Corrective Action Description and Mechanism for Monitoring	Corrective Action Implementation Date	Evidence of Correction	DHCS Response
<p>members to the MCP, but there was no evidence that the member received behavioral health services. Also, there is no documentation that the Plan reached out to the MCP to ensure medically necessary services were made available to the members.</p> <p>In an interview, the Plan stated that after a member was referred to the MCP by the Plan, they do not request follow-up documentation to ensure that the member has been</p>	<p>On January 22, 2026, Molina Healthcare provided DBH with a revised report for Calendar Year 2025 that included outcomes of all referrals submitted to Molina Healthcare.</p> <p>DBH continues to dialogue with Kaiser Permanente following finalization of the MOU on October 21, 2025, to ensure care coordination on referrals.</p> <p>DBH utilized the Quality Management Forum to inform Department of Behavioral Health (DBH) providers about the deficiency identified during the DHCS audit. The Quarterly Forum is attended by DBH and contract providers and is intended to notify and train staff about DHCS requirements.</p>	<p>Healthcare. DBH will ensure care coordination has occurred.</p> <p>In January 2026 Access Unit updated the End of Month report templates that are exchanged with each MCP.</p> <p>February 12, 2026: Through the Quality Management Quarterly Forum, Quality Management educated the Department of Behavioral Health (DBH) and the managed care plans regarding the deficiency.</p>		



Deficiency Number and Finding	Corrective Action Description and Mechanism for Monitoring	Corrective Action Implementation Date	Evidence of Correction	DHCS Response
<p>connected with the MCP. The Plan explained that once they have referred a member to the MCP, their understanding is that they have fulfilled their care coordination responsibilities.</p> <p>However, BHIN 22-065 states that the member needs to be connected with a provider in the new system and the new provider accepts the care of the member, and medically necessary services have been made available to the member.</p>	<p>The DBH Quality Improvement Performance Plan (QI Workplan) subcommittee, Improving Data Collection for Managed Care Plan Referrals, will add a goal on the Quality Improvement Performance Plan for FY 26/27 to monitor the progress of consistently obtaining information from the MCP for referral outcomes.</p> <p>At the end of calendar year 2025, the DBH Managed Care Coordination Unit implemented a process for consistently providing real time notification to the MCPs regarding Transition of Care Tool referral outcomes when DBH is unable to reach member or member declined services.</p>	<p>March 2026 Access Unit established a timeline for care coordination to confirm close the loop, which will be implemented in April 2026.</p> <p>The Timely Access Form is under review and is on target to be fully implemented within the current Fiscal Year.</p> <p>May 14, 2026: At the QM Quarterly Forum, Access Unit and Managed Care Coordination Unit will continue to provide education to DBH providers regarding</p>		



Deficiency Number and Finding	Corrective Action Description and Mechanism for Monitoring	Corrective Action Implementation Date	Evidence of Correction	DHCS Response
<p>When the referral process is not completed and the loop is not closed, members may not receive medically necessary services. This can lead to delays in care and gaps in treatment.</p> <p>These issues can increase the risk of worsening mental health conditions and may result in avoidable emergency room visits or hospitalizations.</p>	<p>DBH’s Innovative Health Information Technology team created a new Timely Access Form in the myAvatar Electronic Health Record to include all DHCS required measuring points. This form is undergoing final executive review. The implementation of this form will be an additional tool for DBH to monitor timely response to referrals received from the managed care plans.</p> <p>As of January 2026, DBH Access Unit updated managed care plan End of Month reports to include the outcome of scheduled appointments.</p> <p>DBH Access Unit has established a timeline for care coordination to confirm closing the loop on Screening Tools,</p>	<p>care coordination, including utilization of the Screening Tool and Transition of Care Tools and Disposition Forms.</p> <p>July 1, 2026: A new goal of monitoring the progress of consistently obtaining information from MCP will be added to the Quality Improvement Performance Plan for FY 26/27. The new plan will be published by July 1, 2026.</p> <p>MOU data-sharing agreements will be updated within Fiscal Year 26-27. MCPs</p>		



Deficiency Number and Finding	Corrective Action Description and Mechanism for Monitoring	Corrective Action Implementation Date	Evidence of Correction	DHCS Response
	<p>which will be implemented in April 2026.</p> <p>DBH Compliance will be updating the MCPs' MOU contracts to include data exchange information requirements.</p> <p>At the May 2026 QM Quarterly Forum, Access Unit and Managed Care Coordination Unit will continue to provide education to DBH providers regarding care coordination utilizing Screening Tools and Transition of Care Tools, including use of the internal disposition form which will assist in accurate reporting back to the MCP.</p>	<p>have expressed their commitment to identify and implement solutions for increased data sharing.</p>		





Signed by:
Submitted by: *Joshua Dugas* **Date: 3/23/2026**
A10B3F4AD0C547A...
Title: Josh Dugas, Acting Director

