

Medi-Cal Behavioral Health Corrective Action Plan (CAP)

MARIN

Compliance Review Date: 1/13/2026 – 1/23/2026

Corrective Action Plan Fiscal Year: 2025-26

SMHS

Deficiency Number and Finding	Corrective Action Description and Mechanism for Monitoring	Corrective Action Implementation Date	Evidence of Correction	DHCS Response
4.4.1 Telehealth Consent Requirements. The plan did not ensure that providers obtained a telehealth consent prior to initial delivery of covered services.	Implement policies and procedures to ensure telehealth consent is obtained prior to the initial delivery of covered services. Monitor during Utilization Review.	October 16, 2023 January 1, 2024	BHRS policy 84-Telehealth Services BHRS policy 25-Documentation Requirements for all SMHS and DMC-ODS services	
4.4.1 Telehealth Consent Requirements. The plan did not ensure that providers obtained a	Implement procedures to ensure telehealth consent is obtained prior to the initial delivery of covered services. Train BHRS Access staff on telehealth requirements Monitor during	January 2025	BHRS Access Telehealth Consent Training	

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telehealth consent prior to initial delivery of covered services.	Utilization Review.			
4.4.1 Telehealth Consent Requirements. The plan did not ensure that providers obtained a telehealth consent prior to initial delivery of covered services.	Implement procedures to ensure telehealth consent is obtained prior to the initial delivery of covered services. Updated training to emphasize need to obtain telehealth consent prior to delivery of telehealth services	January 29, 2026	Updated telehealth consent BHRS documentation training slides	
4.4.1 Telehealth Consent Requirements. The plan did not ensure that providers obtained a telehealth consent prior to initial delivery of covered services.	Implement procedures to ensure telehealth consent is obtained prior to the initial delivery of covered services. Communicated telehealth requirement to all BHRS staff and contractors. Monitor during Utilization Review.	December 2025	QM Corner informational newsletter	

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4.4.1 Telehealth Consent Requirements. The plan did not ensure that providers obtained a telehealth consent prior to initial delivery of covered services.	Implement procedures to ensure telehealth consent is obtained prior to the initial delivery of covered services. Communicated telehealth requirements to all BHRS management staff for them to discuss with their program staff. Monitor during Utilization Review.	May 19, 2026	BHRS Expanded Leadership Meeting (ELM) agenda	

Submitted by: Steve Wilbur, LMFT, CHC

Date: 5/29/2026

Title: Quality Improvement Coordinator