

MENTAL HEALTH SERVICES ACT (MHSA) Performance Review Disagreement Response

1.	County/City:	San Bernardino
2.	Submitted for:	MHSA Performance Review
3.	Date of Audit/Performance Review	8/23/2022
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	San Bernardino County did not provide a description of the county demographics, including, but not limited to size of the county, threshold languages, unique characteristics, age, gender, race/ethnicity in the adopted Fiscal Year (FY) 2021-22 Annual Update (Update). However, the demographics were located in the Three-Year Program and Expenditure Plan (Plan). (California Code of Regulations, title 9, section 3300(b)(4); Mental Health Services Oversight & Accountability	The County must provide a description of the demographics of the county, including but not limited to, size of the county, threshold languages, unique characteristics, age, gender, and race/ethnicity, in each subsequent adopted Plan and Update thereafter.	Cal. Code of Regs., tit. 9, § 3300(B)(4) states that in order to ensure that the Community Program Planning (CPP) Process is adequately staffed, the County shall designate positions and/or units responsible for ensuring that stakeholders that reflect the diversity of the demographics of the County, including but not limited to: <ul style="list-style-type: none"> • Geographic location, • Age, • Gender, and • Race/ethnicity have the opportunity to participate in the CPP process. San Bernardino has met the mandate by designating staff whose role is to ensure that our stakeholders participating in the

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		<p>Commission (MHSOAC) FY 2015-2016 MHSA Annual Update Instructions (p 5); MHSOAC FY 2014-2015 Through FY 2016-2017 MHSA Plan Instructions (pg. 4)).</p>		<p>CPP process for the adopted FY 2020-23 Plan and FY 2021-22 Update were reflective of the countywide demographics.</p> <p>The documents referenced below:</p> <ul style="list-style-type: none"> • Mental Health Services Oversight & Accountability Commission (MHSOAC) FY 2015-2016 MHSA Annual Update Instructions (p 5), and • MHSOAC FY 2014-2015 Through FY 2016-2017 MHSA Plan Instructions (pg. 4) <p>Are provided to assist counties in developing annual updates and plans to include all the necessary elements as required by statute and regulation.</p> <p>Instructions state: “In addition to the required elements above, counties should include the following information as part of the Plan:</p> <ul style="list-style-type: none"> • A description of county demographics, including but not limited to size of the county, threshold languages, unique characteristics, age, gender, and race/ethnicity”- MHSOAC FY

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				<p align="center">2014-2015 Through FY 2016-2017 MHSA Plan Instructions (pg. 4)</p> <p>The instructions themselves are not statute and regulation and San Bernardino County was not able to locate statute or regulation requiring their use in the development of plans or annual updates.</p> <p>San Bernardino County meets the requirements as outlined in Cal. Code of Regs. and respectfully disagrees with the finding by the Department of Healthcare Services (DHCS).</p> <p>For future Plans and Updates San Bernardino County has communicated with our Research and Evaluation (R&E) staff the need for inclusion of countywide demographics data to assure stakeholders in future Plans and Updates that CPP Stakeholder participating is reflective of the countywide demographics. San Bernardino County has also updated our internal Plan/Update checklist to ensure this information is included.</p>

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				DHCS was provided a copy of the interoffice memo issued on January 20, 2023 regarding County Demographics and a copy of San Bernardino's internal checklist on January 20, 2023 confirming implementation of these changes. The next approved upcoming MHSA plan with corrective actions will be submitted on or before June 30, 2023.
8.	Finding #2	San Bernardino County did not include the Annual Prevention and Early Intervention (PEI) Report as a part of the adopted FY 2020-23 Plan or FY 2021-22 Update. (Cal. Code of Regs., tit. 9, § 3560.010).	The County must include the Annual PEI Report as a part of each subsequent adopted Plan or Update thereafter. The Department of Health Care Services (DHCS) will accept the following in lieu of the Annual PEI Report being a part of the Plan or Update: an addendum, an attachment, a link to the report or located on the county's website; as long as reference is made in the Plan or Update where the report may be found.	<p>Cal. Code of Regs., tit. 9, § 3560.010</p> <ul style="list-style-type: none"> • Directs counties to provide an Annual Prevention and Early Intervention (PEI) Report to the MHSOAC. • Indicates that the Annual PEI Report can be part of an Annual Update or Three-Year Program and Expenditure Plan. • States the report must include the information detailed in Section 3560.010(b). <p>San Bernardino has met the mandate by including the Annual PEI Report as part of the adopted FY 2020-23 Plan and FY 2021-22 Update.</p>

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				<p>San Bernardino County meets the requirements as outlined in Cal. Code of Regs. and respectfully disagrees with the finding by the Department of Healthcare Services (DHCS)</p> <p>For future Plans and Updates San Bernardino County will title the PEI section of the Annual Update and Three-Year Program and Expenditure Plan to indicate that the Annual PEI Report is included in the PEI Component section outlined in Cal. Code Regs. Tit. 9 Section 3755. The proposed titles based on reporting time frames are listed below:</p> <ul style="list-style-type: none"> • Annual Prevention and Early Intervention Report and PEI Component • The Three-Year Prevention and Early Intervention Evaluation Report and PEI Component <p>DHCS was provided a copy of the interoffice memo issued on January 20, 2023 regarding PEI plan regulations confirming implementation of these changes. The next approved upcoming</p>

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				MHSA plan with corrective actions will be submitted on or before June 30, 2023.

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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.