

**Ventura Plan of Correction**  
**Per the County Performance Contract Review Report for Review Dates November 17-18 2020**

Finding # or Suggested Improvement #	Finding or Suggested Improvement	Recommendation # (State Corrective Action Step / Identify Timeline / and Evidence of Corrections / Mechanisms for Monitoring Effectiveness)		Score – Comments/ Notes
Finding #1	Ventura County submitted the FY 2018-19 Annual Revenue and Expenditure Report (ARER) past the due date. (California Code of Regulations, Title 9, § 3510(b)).	Recommendation #1: The County shall submit the FY 2019-20 ARER no later than January 31, following the end of the fiscal year	<p>Now that the State has updated the ARER due date to January 31, following the end of the fiscal year, the County will be able to submit the ARER timely by the due date of January 31.</p> <p><i>Evidence submitted by July 26, 2021</i></p> <ul style="list-style-type: none"> <li>• Ventura_County_Finding 1_ FY19-20 ARER Submission (<i>attached</i>)</li> </ul> <p><i>Evidence submitted by January 31, 2022</i></p> <ul style="list-style-type: none"> <li>• Corrected ARER report on/or before January 31, 2022, and the email of the submitted ARER.</li> </ul>	The submitted plan is accepted.
Finding #2	Ventura County did not provide evidence of the methods used by the County to circulate the draft FY 2018-19 Annual Update (Update) for public review and comment during the 30-day review period. (Cal. Code Regs., tit. 9, § 3315(b)(1)(A)).	Recommendation #2: The County shall submit documentation, including a description of the methods used to circulate, for the purpose of public comment, a copy of the update to stakeholders and any other interested parties who requested the draft and include this information in each subsequent Plan and Update hereafter	<p>VCBH will ensure to include a description of the methods used to circulate the plans for public comment, along with the copy submitted to stakeholders and other interested parties. This information will also be included in future drafts and final plans, starting with the 21-22 plan. When making the documents public, VCBH will:</p> <ol style="list-style-type: none"> <li>1. Place advertisements on its prevention website and social media affiliate accounts as well as local newspapers in advance of the public posting of the document in order to notify the public.</li> <li>2. Provide documentation that a public hearing was held by the local mental health</li> </ol>	The submitted plan is accepted.

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			<p>board/commission, including the date of the hearing including the 30-day comment period.</p> <p>3. Provide a summary and analysis of any substantive recommendations.</p> <p>4. A description of any substantive changes made to the proposed Three-Year Program and Expenditure Plan or annual update that was circulated.</p> <p><i>Evidence submitted by June 30, 2022:</i></p> <ul style="list-style-type: none"> <li>• Examples of advertisements,</li> <li>• Examples of social media screenshots,</li> <li>• Examples of newspapers ads,</li> <li>• 21-22 MHSA Annual plan updates,</li> <li>• Example minutes and agendas</li> </ul>	
Finding #3	Ventura County did not identify the unserved and underserved populations in the approved FY 2017-20 Three-Year Program and Expenditure Plan (Plan) and FY	Recommendation #3: The County must include a description of the unserved and underserved populations in the County in the approved FY 2020-23 Plan, FY 2020-21 Update and	While we did not specifically identify unserved and underserved in the FY 17-20 Plan, we have provided these descriptions starting with FY 19-20 Plans. We will ensure this is included going forward including a description of their participation in the CPPP process. We will create an annual update plan checklist to ensure that all "required" elements are in these plans going forward.	The submitted plan is accepted.

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	<p>2018-19 Update and their participation in the Community Program Planning Process (CPPP). (Welfare and Institution Code section 5848(a)(b), 5898; Cal. Code Regs., tit. 9, § 3300(b)(3)(A)).</p>	<p>each subsequent Plan and Update thereafter.</p>	<p>Community Mental Health Needs Assessments (CMHNA) will be completed on an annual five-year basis and outlined in subsequent Annual Update and Plans as stipulated in the regulations. VCBH will continue to outreach to community partner agencies per the local Community Program Planning Process and the most recent CMHNA. Results from the CMHNA are outlined in each annual update. For example, MHSA 2020-2023 Three Year Plan, Program and Expenditure Report and Annual Report 2019-2020, MHSA Annual Update FY 2020-2021.</p> <p><i>Evidence by July 26, 2021</i></p> <ul style="list-style-type: none"> <li>• MHSA 2020-2023 Three Year Plan, Program and Expenditure Report 1-212, pgs. 21-30 and Annual Report 2019-2020 (<i>attached</i>),</li> <li>• MHSA Annual Update FY 2020-2021, pgs. 22-25, (<i>attached</i>),</li> </ul> <p><i>Evidence submitted by June 30, 2022</i></p> <ul style="list-style-type: none"> <li>• Annual Update checklist,</li> <li>• 21-22 Annual Plan with highlighted section(s),</li> <li>• Examples of outreach efforts.</li> </ul>	

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Finding #3a	Ventura County did not identify the unserved and underserved populations in the approved FY 2017-20 Three-Year Program and Expenditure Plan (Plan) and FY 2018-19 Update and their participation in the Community Program Planning Process (CPPP). (Welfare and Institution Code section 5848(a)(b), 5898; Cal. Code Regs., tit. 9, § 3300(b)(3)(A)).	Recommendation #3a: The County must ensure that stakeholder participation include representatives of unserved and underserved populations and family members of unserved/underserved populations in the CPPP in the approved FY 2020-23 Plan, FY 2020-21 Update and each subsequent Plan and Update thereafter.	VCBH will clearly identify in its FY 2020-2023 Three-Year Program and Expenditure Plan and subsequent Annual Updates who the underserved and unserved populations are in Ventura County and how they were identified. MHPA stakeholder participation will reflect those underserved and unserved populations. Stakeholders will be invited to participate in the county-wide stakeholders meetings tailored to specific populations in the CPPP. VCBH will provide evidence of stakeholder participation with a list of stakeholders, outreach email, and policy and procedures (P&P) regarding their CPPP process that includes the steps taken. This information will be incorporated into the FY 2020-2023 Three-Year Program and Expenditure Plan, and all subsequent annual updates and plans.  <i>Evidence submitted by June 30, 2022</i> <ul style="list-style-type: none"> <li>• Identifying the undeserved and unserved populations are in the FY 20-23 Three-Year Program and Expenditure Plan</li> <li>• Evidence of stakeholders invited to participate in meetings tailored to specific populations in the CPPP</li> <li>• Evidence of stakeholder participation</li> </ul>	The submitted plan is pending.
Finding #4	Ventura County lacked public comments received	Recommendation #4:	VCBH is dedicating additional resources to advertising the draft of the Annual Update and Plans in advance of the public hearing before the	The submitted

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	during the 30-day draft circulation and public review period in the approved FY 2018-19 Update. (W&I Code section 5848(b)).	The County shall include a summary and analysis of any substantive recommendations received during the 30-day public comment period and the County’s resulting actions, including any substantive changes made to the Update in response to public comments in the approved FY 2020-23 Plan and FY 2020-21 Update and each subsequent Plan and Update thereafter	<p>next annual update. Comments will be summarized and published in the final version of the report.</p> <p><i>Evidence submitted by June 30, 2022</i></p> <ul style="list-style-type: none"> <li>• Example advertisements,</li> <li>• 21-22 Annual Plan with highlighted section(s),</li> <li>• Examples of comment summary.</li> </ul>	plan is accepted.
Finding #5	Ventura County did not submit the approved FY 2018-19 Update to the Department of Health Care Services (DHCS) within 30 days of adoption by the County Board of Supervisors. (W&I Code 5847(a)).	Recommendation #5: The County must ensure the approved FY 2020-23 Plan, FY 2019-20 Update and all Plans and Updates thereafter are submitted to the DHCS within 30 days of adoption by the County Board of Supervisors.	<p>The 18/19 Annual Update was adopted on June 4, 2019 and submitted to DHCS June 21, 2019. The FY 2020-2023 Plan, and FY 2019/20 Update was also submitted to DCHS on June 26, 2020, after adoption and minute order were completed by the Board of Supervisors on June 9th, 2020. These were submitted within the 30 days of adoption.</p> <p>All Annual Update and Plans have and will continue to be submitted to the DHCS email</p>	The submitted plan is accepted.

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			<p>address within one week of the Board of Supervisor minute order approval.</p> <p><i>Evidence submitted by July 26, 2021</i></p> <ul style="list-style-type: none"> <li>• FY 18–19-minute order (<i>attached</i>),</li> <li>• Minute order FY 20-23 Plan (<i>attached</i>),</li> <li>• RE_ [External] Annual Update Question (<i>attached</i>).</li> </ul> <p><i>Evidence submitted by June 30, 2022</i></p> <ul style="list-style-type: none"> <li>• Board of Supervisor minute order.</li> <li>• 21-22 MHSA Annual Update.</li> </ul>	
Finding #6	Ventura County did not provide evidence the County provides Full Service Partnerships (FSP) services to all age groups: children (0-15), transitional age youth (TAY) (16-25), adult (26-59), and older adult (60 and older). (Cal. Code Regs., tit. 9, § 3620(j)).	Recommendation #6: The County shall provide FSP services to all age groups: children (0-15), transitional age youth (TAY) (16-25), adult (26-59), and older adult (60 and older) and indicate in each subsequent Plan and Update hereafter	<p>A youth FSP treatment track is being established in FY 21/22. The youth FSP Expansion will serve youth ages 0-15 in a general FSP treatment program embedded into the existing clinics and programs with specially trained staff able to maintain a lower staff to client ratio. This will be modeled based on the current Adult Clinics FSP treatment track program.</p> <p>Once established the County will provide FSP services to all age groups: children (0-15) through the Insights and Youth FSP Expansion; transitional age youth (TAY) (16-25) through the Casa Esperanza and Transitions programs; adult (26-59) through EPICS, AOT, VISTA, and Adult</p>	The submitted plan is accepted.

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			<p>FSP; and older adult (60 and older) through the Adults Treatment Tracks and Older Adults FSP.</p> <p><i>Evidence submitted by June 30, 2022</i></p> <ul style="list-style-type: none"> <li>• Program information,</li> <li>• Training reports,</li> <li>• Example screenshots,</li> <li>• Example meeting agenda,</li> <li>• Example Meeting minutes,</li> <li>• 21-22 MHSA Annual Update.</li> </ul>	
Finding #7	Ventura County did not report the estimated number of clients the County plans to serve in each FSP targeted age group in the approved FY 2017-20 Plan. (Cal. Code of Regs., tit. 9, § 3650(a)(3)).	Recommendation #7: The County must report the number of FSP clients the County plans to serve in each age group: children (0-15), transitional age youth (TAY) (16-25), adult (26-59), and older adult (60 and older) for each fiscal year of the approved FY 2020-23 Plan and each subsequent Plan thereafter.	<p>The County will set and review FSP targets annually in advance of each Three-year Plan or Annual Update. Targets for the next few years will increase at the rate of 3-10 percent per age category based on past numbers served and state eligibility requirements.</p> <p>Targets will continue to be set with clinical input based on current Multi-County FSP work taking place with Third Sector and may vary from year to year until the overhaul of the VCBH FSP system is fully implemented. Targets have been set are reflected in the FY 21/22.</p> <p><i>Evidence submitted by June 30, 2022</i></p> <ul style="list-style-type: none"> <li>• 21-22 MHSA Annual Update.</li> </ul>	The submitted plan is accepted.

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Finding #8	Ventura County's Community Services and Supports (CSS) programs/services were not consistent with the approved FY 2017-20 Plan, FY 2018-19 Update, and FY 2018-19 ARER. Specifically, Child/Youth Treatment (Non-FSP), Older Adult Treatment (Non-FSP), Children's Outpatient Services, and TAY Treatment (NonFSP) are listed in the approved FY 18-19 Update. These programs/services are not included in the Plan or ARER. (W&I Code Section 5892(g)); Cal. Code Regs., tit. 9, § 3320(a)).	Recommendation #8: The County must ensure that the program names listed in the CSS component section of the approved FY 2020-23 Plan and FY 2019-20 Update, and each subsequent year thereafter, are consistent with the budget pages and names in the ARER. If the program or service did not occur, report the program or service on the ARER and indicate zero expenditures. Any discrepancies or name changes must be explained in the approved Update.	For the FY20-21 ARER a crosswalk will be developed which matches the program names on the Annual Update to the program codes which are used in the financial system. In addition, during the final review of the ARER the program names will be compared to the Annual Updates to ensure the program names are correct. If there is no cost for the program zero expenditures will be reported on the ARER.  This will be done with the next ARER which will be submitted on or before 1/31/22.  <i>Evidence submitted by January 31, 2022</i>  <ul style="list-style-type: none"> <li>• Corrected ARER report.</li> <li>• Email of submitted ARER.</li> </ul>	The submitted plan is accepted.
Finding #9	Ventura County lacked evidence of a validated method used to measure	Recommendation #9: The County must select and use a validated method to	VCBH has added a validated measure to the evaluation of current and future PEI Stigma and Discrimination Reduction Programs. The peer reviewed paper detailing the development,	The submitted plan is accepted.

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	<p>changes in attitudes, knowledge, and/or behavior related to mental illness or seeking Mental Health Services Act (MHSA) Performance Contract Review Report Ventura County Program Review November 17-18, 2020 3 mental health services for each PEI Stigma and Discrimination Reduction Program in the approved FY 2017-20 Plan and FY 2018-19 Update. (Cal. Code Regs., tit. 9, §§ 3750(d); 3755(f)(3)).</p>	<p>measure changes in attitudes, knowledge, and/or behavior related to mental illness or seeking mental health services. The County must include documentation of the validated measure(s) used for each PEI Stigma and Discrimination Reduction Program within the approved FY 2020-23 Plan, FY 2019-20 Update and each subsequent Plan and Update thereafter</p>	<p>reliability and validity of the added measure is cited below and reflected on the second page of the attached document.</p> <p>This tool will be used as of July 1, 2021 and will be evidenced in the fiscal year 2021-2021 Annual Update and subsequent Annual Updates. The consistent use of this tool will be monitored through quarterly data checks by an external evaluator and findings will be provided to program staff for continuous reflection and progress monitoring.</p> <p>Hammer JH, Parent MC, Spiker DA. Mental Help Seeking Attitudes Scale (MHSAS): Development, reliability, validity, and comparison with the ATSPPH-SF and IASMHS-PO. J Couns Psychol. 2018 Jan;65(1):74-85. doi: 10.1037/cou0000248. PMID: 29355346.</p> <p><i>Evidence submitted by July 26, 2021</i></p> <ul style="list-style-type: none"> <li>• Ventura County Finding 10 VCPEI_FY2122_ParticipantOutcomeSurvey SDR for IOOV English/Spanish (attached).</li> </ul> <p><i>Evidence submitted by June 30, 2022</i></p> <ul style="list-style-type: none"> <li>• 21-22 MHSA Annual Update,</li> </ul>	

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			<ul style="list-style-type: none"> <li>• Example of the quarterly data checks,</li> <li>• Example agenda and meeting minutes.</li> </ul>	
Finding #10	Ventura County did not dedicate at least 51% of their PEI funds to serve individuals who are 25 years old or younger. (Cal. Code of Regs., tit. 9, § 3706(b)).	Recommendation #10: The County must develop and implement accounting and cost allocation policies and procedures that will allow the County to allocate a majority of PEI funds to serve individuals who are 25 years old or younger	Ventura County Behavioral Health will create a PEI accounting and cost allocation protocol by December 31, 2021.  <i>Evidence:</i> PEI Accounting and Cost Allocation Evidence by December 31, 2021.	The submitted plan is accepted.
Finding #11	Ventura County PEI programs/services were inconsistent with the approved FY 2018-19 Update and the FY 2018-19 ARER. For example, the approved FY 2018-19 Update shows 16 programs under the PEI Stigma and Discrimination Reduction component. The FY 2018-19 ARER has zero programs listed as Stigma and	Recommendation #11: The County must ensure that the programs listed in the PEI component section of the approved FY 2020-23 Plan and FY 2019-20 Update, and each subsequent year thereafter, are consistent with the ARER. The budget in the approved Plan and Update should be consistent with the ARER. If the program or service did not	For the FY20-21 ARER a crosswalk will be developed which matches the program names on the Annual Update to the program codes which are used in the financial system. In addition, during the final review of the ARER the program names will be compared to the Annual Updates to ensure the program names are correct. If there is no cost for the program zero expenditures will be reported on the ARER.  This will be done with the next ARER which will be submitted on or before 1/31/22.  <i>Evidence submitted by January 31, 2022</i>  <ul style="list-style-type: none"> <li>• Corrected ARER report.</li> </ul>	The submitted plan is accepted.

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	Discrimination Reduction programs. The FY 2018-19 Update shows COMPASS as a CSS program. The FY 2018-19 ARER lists COMPASS as a PEI program. (W&I Code section 5892(g)).	occur, report the program or service on the ARER and indicate zero expenditures. Any discrepancies or name changes must be explained in the approved Plan and Update	<ul style="list-style-type: none"> <li>• Email of submitted ARER.</li> </ul>	
Finding #12	Ventura County Innovation (INN) programs/services were inconsistent with the approved FY 2017-20 Plan, FY 2018-19 Update and FY 2018-19 ARER. Specifically, Conocimiento is listed in the Update, not in the Plan or ARER. Quality of Life Improvement, Adult Health Care Access/Health Navigation, and Mixteco Research are listed in the Plan, not in the Update or	Recommendation #12: The County must ensure that the programs listed in the INN component section of the approved FY 2020-23 Plan and FY 2019-20 Update, and each subsequent year thereafter, are consistent with the ARER. The budget in the Mental Health Services Act (MHSA) Performance Contract Review Report Ventura County Program Review November 17-18, 2020 4 approved	<p>For the FY20-21 ARER a crosswalk will be developed which matches the program names on the Annual Update to the program codes which are used in the financial system. In addition, during the final review of the ARER the program names will be compared to the Annual Updates to ensure the program names are correct. If there is no cost for the program zero expenditures will be reported on the ARER.</p> <p>This will be done with the next ARER which will be submitted on or before 1/31/22.</p> <p><i>Evidence submitted by January 31, 2022</i></p> <ul style="list-style-type: none"> <li>• Corrected ARER report.</li> <li>• Email of submitted ARER.</li> </ul>	The submitted plan is accepted.

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	ARER. (W&I Code Section 5892(g));Cal. Code Regs., tit. 9, § 3320(a)).	Plan and Update should be consistent with the ARER. If the program or service did not occur, report the program or service on the ARER and indicate zero expenditures. Any discrepancies or name changes must be explained in the approved Plan and Update		
Suggested Improvement #1	Transparency and Consistency	Suggested Improvement #1: DHCS recommends program names and service categories detailed in the approved Plan and Update match the program names and service categories in the ARER. The ARER should be consistent with the budget in the approved Plan and Update. If the program or service did not occur, report the	<p>For the FY20-21 ARER a crosswalk will be developed which matches the program names on the Annual Update to the program codes which are used in the financial system. In addition, during the final review of the ARER the program names will be compared to the Annual Updates to ensure the program names are correct. If there is no cost for the program zero expenditures will be reported on the ARER.</p> <p>This will be done with the next ARER which will be submitted on or before 1/31/22.</p> <p><i>Evidence submitted by January 31, 2022</i></p> <ul style="list-style-type: none"> <li>• Corrected ARER report.</li> <li>• Email of submitted ARER.</li> </ul>	The submitted plan is accepted.

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		program or service on the ARER and indicate zero expenditures.		
Suggested Improvement #2	Policies and Procedures	<p>Suggested Improvement #2: DHCS recommends the County develop FSP specific policies and procedures that include, but are not limited to identification of FSP eligibility criteria, position(s) that serve as the Personal Service Coordinator (PSC)/single point of contact for FSP clients, process for ensuring that a PSC or other qualified individual known to the client/family is available to respond to the client/family 24 hours a day, 7 days a week to provide after-hours interventions, cultural competency requirements for PSCs</p>	<p>All of the VCBH's FSP policies were provided in the original submission on October 9, 2020, and again provided on December 18, 2020.</p> <p>However, considering the Suggested Improvement, staff will review and revise all current FSP policies, ensuring that all required elements are included. If a new policy is identified as being needed, staff will create the new policy and take it through the Policy Approval Process.</p> <p>The County is in development of additional eligibility, graduation, and service guidelines though the Multi-County FSP project with Third Sector. Updates on this process will be communicated though subsequent Annual Update and Three-year plans until the project is concluded in 2024.</p> <p>Following these revisions, staff will implement policy training with all relevant staff. All of the above will be completed by July 31, 2022.</p> <p><i>Evidence submitted by July 31, 2022</i></p> <ul style="list-style-type: none"> <li>• Updated and/or new FSP polices.</li> </ul>	The submitted plan is accepted.

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		and requirements for Individual Services and Support Plans (ISSP)/Client Plans/Treatment Plans.	<ul style="list-style-type: none"> <li>• Training reports associated with each policy.</li> </ul>	
Suggested Improvement #3	Recent Data	Suggested Improvement #3: DHCS recommends the County submit data in their Plan and Update that reflects the previous year or the most recent data available (i.e., a FY 18-19 Plan or Update should include data from the previous year of FY 2017-2018).	<p>VCBH will submit data in our plans and updates using the data from the previous year or the most recent data available.</p> <p>For example, our 21-22 Annual Plan update will utilize data from the FY 20-21 data.</p> <p><i>Evidence submitted by June 30, 2022</i></p> <ul style="list-style-type: none"> <li>• 21-22 Annual Plan with data from the prior year.</li> </ul>	The submitted plan is accepted.