

**Alameda Plan of Correction**  
**Per the County Performance Contract Review Report for Review Date March 24, 2020**

<b>Finding # or Suggested Improvement #</b>	<b>Finding or Suggested Improvement</b>	<b>Recommendation # (State Corrective Action Step / Identify Timeline / and Evidence of Corrections / Mechanisms for Monitoring Effectiveness)</b>		<b>Score – Comments/ Notes</b>
Finding #1	Alameda County did not include a statement explaining how the Community Program Planning Process (CPPP) requirements were met in the approved FY 2018-19 Annual Update (Update). (California Code of Regulation, title 9, section 3310(e)).	Recommendation #1: The County must include a statement explaining how the CPPP requirements were met in the approved FY 2020-23 Three-Year Program and Expenditure Plan (Plan) and FY 2019-20 Update and each subsequent Plan and Update thereafter.	<p>Alameda County will include a statement explaining how the CPPP requirements were met in the approved FY 2020-23 Three-Year Program and Expenditure Plan (Plan) and FY 2019-20 Update and each subsequent Plan and Update thereafter.</p> <p>a) Alameda County will institute a dual monitoring process to ensure that a section on CPPP is included in the approved FY 2020-23 Three-Year Program and Expenditure Plan (Plan) per California Code of Regulation, title 9, section 3310(e).</p> <p>The dual monitoring system will include the MHSA Senior Planner, who will draft the CPPP section and the MHSA Division Director will review the section and ensure that it's included in the final version of the Three-year Plan or Plan Update when it's posted for 30-day public comment.</p> <p>b) Alameda County will develop a Three-Year Plan and Plan Update item checklist to ensure all regulatory required items are included in the There-Year Plan or Plan Update, including CPPP information. This</p>	The submitted plan is accepted.

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			checklist will be completed by the end of FY 20-21.	
Finding #2	Alameda County did not provide an estimate of the number of clients, in each age group, to be served in the Full Service Partnership Service (FSP) Category for each fiscal year in the approved FY 2017-20 Plan (Cal. Code of Regs., tit.9, § 3650(a)(3)).	Recommendation #3: The County must provide an estimate of the number of FSP clients to serve in each age group: children (0-15), transitional age youth (16-25), adult (26-59) and older adult (60 and older) for each fiscal year in the approved FY 2020-23 Plan and each subsequent Plan thereafter.	<p>Alameda County will provide an estimate of the number of FSP clients to serve in each age group: children (0-15), transitional age youth (16-25), adult (26-59) and older adult (60 and older) for each fiscal year in the approved FY 2020-23 Plan and each subsequent Plan thereafter.</p> <p>a) Alameda County will institute a dual monitoring process to ensure that within each FSP program description an estimate of the number of clients to be served by age is included in the approved FY 2020-23 Three-Year Program and Expenditure Plan per California Code of Regulation, title 9, section 3310(e).</p> <p>The dual monitoring system will include the MHSA Senior Planner, who will draft the FSP section and the MHSA Division Director will review the section and ensure that it's included in the final version of the Three-Year Plan or Plan Update when it's posted for 30-day public comment.</p> <p>b) Alameda County will develop a Three-Year Plan and Plan Update item checklist to ensure all regulatory required items are included in the Three-Year Plan or Plan</p>	The submitted plan is accepted.

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			<p>Update including FSP age information. This checklist will be completed by the end of FY 20-21.</p> <p>Alameda is requesting additional time beyond the date of the POC submission for the development of this checklist due to COVID and the additional work required for all ACBH county staff at this time.</p>	
Finding #3	Alameda County lacked evidence of a validated method used to measure changes in attitudes, knowledge, and/or behavior related to mental illness or seeking mental health services for each Prevention and Early Intervention (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)).	Recommendation #4: The County must select and include documentation of the validated measure(s) used for each PEI Stigma and Discrimination Reduction Program and address all components of Cal. Code of Regs., tit. 9 §§ 3750(d), 3755(f) in the approved FY 2020-23 Plan and FY 2019-20 Update and each subsequent Plan and Update thereafter.	<p>Alameda County will select and include documentation of the validated measure(s) used for each PEI Stigma and Discrimination Reduction Program and address all components of Cal. Code of Regs., tit. 9 §§ 3750(d), 3755(f) in the approved FY 2020-23 Plan and FY 2019-20 Update and each subsequent Plan and Update thereafter.</p> <p>a) Alameda County will institute a dual monitoring process to ensure that information on measurement validation is included and explained for each PEI Stigma and Discrimination Reduction Program starting with the approved FY 2020-23 Three-Year Program and Expenditure Plan (Plan) per California Code of Regulation, title 9, section 3310(e).</p> <p>The dual monitoring system will include the MHSA PEI Coordinator, who will draft the</p>	The submitted plan is accepted.

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			<p>PEI section and the MHSA Division Director who will review the section and ensure that it's included in the final version of the Three-Year Plan or Plan Update when it's posted for 30-day public comment.</p> <p>b) Alameda County will develop a Three-Year Plan and Plan Update item checklist to ensure all regulatory required items are included in the Three-Year Plan or Plan Update including information on the evaluation method and tools for each Stigma and Discrimination program that Alameda implements.</p>	
Finding #4	Alameda county did not use at least 51% of PEI funds to serve individuals 25 years or younger in FY 2018-19. (Cal. Code Regs., tit. 9, § 3706(b)).	Recommendation #5: 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 or younger.	<p>Alameda County will continue to implement and monitor the allocation of PEI funds in order to ensure that at least 51% of PEI funds to serve individuals 25 years or younger.</p> <p>a) Alameda currently has language in each PEI contract that states, "Contractor shall ensure that at least 51% of funds will be directed towards supporting children of youth who are zero to 25 years old."</p> <p>b) Alameda has started monitoring to this regulation through the submission of quarterly reports and a data dashboard where age of client served per program is</p>	The submitted plan is accepted.

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			<p>tracked in order to comply with Cal. Code Regs., tit. 9, § 3706(b).</p> <p>c) Alameda has also started to implement PEI site visits where this item of 51% for children and youth who are zero to 25 years old is reviewed. This new procedure was initiated in summer 2020. Monitoring tools were submitted to DHCS as part of this PCR.</p> <p>d) Alameda County will draft a policy and procedure by the end of FY 20/21 to ensure the county allocates a majority of PEI funds to serve individuals who are 25 years or younger.</p> <p>Alameda is requesting additional time for the development of the policy and procedure beyond the date of the POC submission due to COVID and the additional work required for all ACBH county staff at this time.</p> <p>e) The Alameda MHSa finance team will provide training on the accounting and cost allocation policy to all MHSa program staff, once policy is approved.</p>	
Suggested Improvement #1	MHSa Transparency and Consistency	Suggested Improvement #1:	Based on DHCS recommendations, starting with the FY 19/20 Annual Revenue and Expenditure	The submitted

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		<p>DHCS recommends that the Annual Revenue and Expenditure Report (ARER) be consistent with the budget in the approved Plan and Update. If the program or service did not occur, report the program or service on the ARER and indicate zero expenditures. Provide an update of that program or service in the following approved Plan or Update.</p>	<p>Report (ARER) Alameda County will ensure that the ARER is consistent with the budget in the approved Plan and Update. Particular items ACBH will focus on include:</p> <ul style="list-style-type: none"> <li>a) If a program or service did not occur (but is listed in the approved Plan or Update, Alameda will report the program or service on the ARER and indicate zero expenditures.</li> <li>b) Alameda will provide an update for programs with no expenditures in the following approved Plan or Update.</li> <li>c) The MHSA Division Director will work with the MHSA Finance team and program staff during both the processing of the ARER as well as during the development of a Three-Year Plan or Plan Update to ensure that all programs and expenditures are captured.</li> <li>d) Alameda County will develop a Three-Year Plan and Plan Update item checklist to ensure all regulatory required items are included in the Three-Year Plan or Plan Update including ensuring that the ARER matches up to the Three-Year Plan or Plan Update. This checklist will be completed by the end of FY 20/21.</li> </ul>	<p>plan is accepted.</p>

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Suggested Improvement #2	Community Program Planning Process (CPPP) Development	Suggested Improvement #2: DHCS recommends the County compare stakeholder and County demographics to ensure desired participation of target populations in the CPPP and to determine whether stakeholders reflect the diversity of the demographics of the County, including but not limited to geographic location, age, gender, race, and unserved and/or underserved populations. DHCS recommends the County include this comparison of both stakeholder demographics and overall County demographics within the approved Plans and Updates.	Based on DHCS recommendations, Alameda will include a comparison between our stakeholders and the county demographics to ensure desired participation of target populations in the CPPP and to determine whether stakeholders reflect the diversity of the demographics of Alameda County, including but not limited to geographic location, age, gender, race, and unserved and/or underserved populations.  a) This CPPP information will be included in Alameda’s MHSa Three-Year Plan FY 20/21-22/23, which will be posted on 8/21/20.	The submitted plan is accepted.

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Suggested Improvement #2a	Community Program Planning Process (CPPP) Development	Suggested Improvement #2a: DHCS recommends the County incorporate details on how staff and stakeholder training on MHSA and CPPP is determined “as needed” in the MHSA Plan Approval Process policy and procedure.	Based on DHCS recommendations, Alameda will incorporate details on how staff and stakeholder training on MHSA and CPPP is determined “as needed” in the MHSA Plan Approval Process policy and procedure (P&P).  a) This change in our MHSA Plan Approval Process P&P will be completed by the end of calendar year 2020.	The submitted plan is accepted.
Suggested Improvement #2b	Community Program Planning Process (CPPP) Development	Suggested Improvement #2b: DHCS recommends the County update the MHSA Plan Approval Process policy and procedure to include the approved Plans and Updates will be submitted to the Mental Health Services Oversight and Accountability Commission and DHCS within 30 days of adoption.	Based on DHCS recommendations, Alameda will update their MHSA Plan Approval Process P&P to include wording that states “the approved Plans and Updates will be submitted to the Mental Health Services Oversight and Accountability Commission and DHCS within 30 days of adoption.”  a) This change in our MHSA Plan Approval Process P&P will be completed by the end of calendar year 2020.	The submitted plan is accepted.
Suggested Improvement #3	Local Review Process	Suggested Improvement #3:	Based on DHCS recommendations, Alameda will include a description of the methods used to	The submitted

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		DHCS recommends the County include a description of the methods used to circulate the draft Plans and Updates in the approved Plans and Updates.	<p>circulate the draft Plans and Updates in the approved Plans and Updates.</p> <p>a) This Local Review Process information will be included in Alameda’s MHTSA Three-Year Plan FY 20/21-22/23, which will be posted on 8/21/20.</p>	plan is accepted.
Suggested Improvement #4	FSP Policies and Procedures	Suggested Improvement #4: 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	<p>Based on DHCS recommendations, Alameda will develop a FSP specific policy and procedure (P&amp;P) that includes, but 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 and requirements for Individual Services and Support Plans (ISSP)/Client Plans/Treatment Plans.</p> <p>a) This new FSP P&amp;P will be completed by the end of FY 20/21. A draft version will be submitted to DHCS before its finalized by the county.</p>	The submitted plan is accepted.

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		week to provide after-hours interventions, cultural competency requirements for PSCs and requirements for Individual Services and Support Plans (ISSP)/Client Plans/Treatment Plans.		