

Butte Plan of Correction
Per the County Performance Contract Review Report for Review Dates September 25-26 2019

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	Butte County submitted the FY 2017-18 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 2018-19 ARER no later than December 31, following the end of the fiscal year.	This Finding has been removed from the Plan of Correction.	N/A.
Finding #2	Butte County does not have a designated position responsible to ensure the Community Program Planning Process (CPPP) is adequately staffed. (Cal. Code Regs., tit. 9, § 300(b)). Butte County Department of Behavioral Health (BCDBH) policy and procedure #339 (page 1 of 4, effective 7/17/19) lacks identifying the designated position and/or units responsible for the overall CPPP	Recommendation #2: The County shall provide evidence that there is a designated position(s) and/or unit(s) responsible for the CPPP and the requirements outlined in Cal. Code Regs., tit 9, § 3300(b)(1-5).	Policy and Procedure #339 has been modified to more specifically define and enumerate the designated position(s) that formally embrace the responsibility for ensuring that the CPPP is adequately staffed. The updated Policy and Procedure was approved by the BCBH Policy Committee's in December 2020.	The submitted plan is accepted.

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Finding #3	Butte County lacked a narrative analysis that assesses the mental health needs of the unserved, underserved/inappropriately served, and fully served county residents who qualify for MHSA services and an assessment of its capacity to implement proposed programs and services in their adopted FY 2017-20 Three-Year Program and Expenditure Plan (Plan). (Cal.Code Regs., tit. 9, §3650(a)).	<p>Recommendation #3: The County shall include a narrative analysis of its assessment of the County’s mental health needs, its capacity to implement proposed programs/services and address all components of Cal. Code Regs., tit 9, § 3650(a) in the adopted FY 2020-23 Plan and each subsequent Plan, thereafter.</p> <p>Recommendation # 3a The County shall use the results of the assessment to develop the approved Plan.</p>	<p>While Butte County acknowledges a lack of identified analysis in the FY17-20 Three Year Program and Expenditure Plan, the County did facilitate and analyze the needs assessment for the 2018 Cultural Competency Plan.</p> <p>The Department has provided an analysis of mental health needs and a capacity assessment for Butte County in the FY20-23 Three Year Plan. Please see pages 7-10 in the FY20-23 Three Year Plan which is posted on the Department’s MHSA website at https://www.buttecounty.net/behavioralhealth/administration/mental-health-services-act</p> <p>The narrative analysis will be incorporated into the approved Plan for each subsequent Plan thereafter.</p>	The submitted plan is accepted.
Finding #4	Butte County did not report the estimated number of clients the County plans to serve in each Full Service Partnership (FSP) targeted age group in the FY 2017-20 Plan.	<p>Recommendation #4: The County shall report the number of FSP clients the County plans to serve in each age group: children (0-15), transitional age youth (16-25),</p>	Butte County will generate and disclose “Target” frequencies on the number of FSP-related individuals that it intends to serve and will incorporate into each subsequent Plan thereafter. These counts are expressed within the referenced age groups for the FY 2020-23 Plan and will be for every year thereafter.	The submitted plan is accepted.

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	(Cal. Code of Regs., tit. 9, § 3650(a)(3)).	adult (26-59) and older adult (60 and older) for each fiscal year of the adopted FY 2020-23		
Finding #5	Butte 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 adopted FY 2017-20 Plan and FY 2018-19 Annual Update (Update). (Cal. Code Regs., tit. 9, §§ 3750(d), 3755(f)(3)).	Recommendation #5: The County shall 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 their approved FY 2020-23 Plan and FY 2019-20 Update and each subsequent Plan and Update thereafter.	This Finding has been removed from the Plan of Correction.	N/A
Item #1	MHSA Transparency and Consistency	Suggested Improvement #1:	Program names and service categories detailed in the approved Plan and Update will be consistent with the program names and service	The submitted plan is accepted.

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		The Department of Health Care Services (DHCS) recommends program names and service categories detailed in the approved Plan and Update match the program names and service categories in the ARER.	categories in the ARER; and with each subsequent Plan, Update and ARER thereafter.	
Item #1a	MHSA Transparency and Consistency	Suggested Improvement #1a: The ARER should 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.	Program names and service categories detailed in the approved Plan and Update will be consistent with the program names and service categories in the ARER; and with each subsequent Plan, Update and ARER thereafter.	The submitted plan is accepted.
Item #2	CPPP Policies and Procedures	Suggested Improvement #2: DHCS recommends the County incorporate all aspects of the current CPPP into County written policies and procedures and/or duty	Policy and Procedure #339 has been modified to more specifically define and enumerate the designated position(s) that formally embrace the responsibility for ensuring that the CPPP is adequately staffed. The updated Policy and Procedure was approved by the BCBH Policy Committee's in December 2020.	The submitted plan is accepted.

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		statements. This includes CPPP designated positions, staff training, stakeholder training, client, client's family, peer and stakeholder outreach and involvement		
Item #3	MHSA Oversight and Performance Outcomes	Suggested Improvement #3 DHCS recommends the County develop Full Service Partnership (FSP) specific policies and procedures that include, but is not limited to the identification of FSP eligibility criteria, position(s) that serve as the Personal Service Coordinator (PSC)/single point of contact for FSP clients, and cultural competency requirements for PSCs	Butte County is committed to implementing an objective tool (i.e., Level of Care Recovery Inventory for Adults and Child and Adolescent Level Of Care Utilization System for Youth) to define levels of care of clients to ensure that they receive the most appropriate services based on an assessment of their respective needs. This approach will lead to a full review of the BCBH continuum of care, and restructuring may happen as a result, including redefining policies and procedures for Full Service Partnership Programs. Currently, the department is eliciting and considering stakeholder feedback that will ultimately inform the enhanced structure of the levels of care, and is incorporating this feedback - and vision - into the FY20-23 Three Year Program and Expenditure Plan. Moreover, the County has developed an FSP eligibility criteria and partnership signature tool that are currently being modeled into Avatar, our electronic health record. Also, Personal Service Coordinators are	The submitted plan is accepted.

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			<p>assigned to all FSP clients and function as the primary point of contact. Butte County has begun the implementation and development of a comprehensive FSP Guideline to be used as an internal framework for FSP. This guideline will include specific policies and procedures that include, but is not limited to, the identification of FSP eligibility criteria, position(s) that serve as the Personal Service Coordinator (PSC)/single point of contact for FSP clients, and cultural competency requirements for PSCs. It is anticipated that this FSP Guideline will be completed no later than April 1st, 2021.</p>	
Item #3a	MHSA Oversight and Performance Outcomes	Suggested Improvement #3a: DHCS recommends the County contracts with service providers include the performance goals from the County's approved Plan and Update that apply to each provider's programs and services.	Butte County has amended the existing contract boilerplate templates to include the articulation of measureable performance goals as they relate to the County's approved Plan and Update. These goals are crafted in a manner that is specific to each MHSA Contracted Service Provider and incorporated into the "Scope of Work" section of each contract. These changes went into effect for FY 2020/21 and every year thereafter.	The submitted plan is accepted.