

EI Dorado Plan of Correction
Per the County Performance Contract Review Report for Review Dates October 17-19, 2018

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	EI Dorado County lacked a narrative analysis that assesses the mental health needs of unserved, underserved/inappropriately served, and fully served county residents who qualify for MHSA services, and an assessment of its capacity to implement proposed programs/services in their adopted FY 2014-17 Three Year Program and Expenditure Plan (Plan). (Cal. Code Regs., tit. 9, §3650(a)).	Recommendation #1	<p>The County must 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 of Regs., tit 9, §3650(a) in the adopted FY 2020-23 Plan and each subsequent Plan thereafter.</p> <p>----- EI Dorado County’s Response:</p> <p>Corrective Action: EI Dorado County’s Board of Supervisors adopted EI Dorado County’s MHSA Three-Year Program and Expenditure Plan for Fiscal Years (FY) 2020/21-2022/23 on June 9, 2020. Therefore, EI Dorado County is unable to implement this recommendation in the FY 2020-23 Plan because it was adopted before EI Dorado County received the Performance Contract Review Report. However, EI Dorado County will implement this recommendation in the Fiscal Year 2023/24-2025/26 MHSA Three-Year Program and Expenditure Plan, and each subsequent Plan thereafter.</p> <p>Timeline: The next Three-Year Program and Expenditure Plan will be taken to the EI</p>	The submitted plan is accepted.

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			<p>Dorado County Board of Supervisors in the late-Spring of 2024.</p> <p>Evidence of Corrections: The adopted Plans will be considered evidence of corrections.</p> <p>Mechanisms for Monitoring Effectiveness: Monitoring effectiveness of this plan of action will be performed by the MHSA Team and reviewed by the EI Dorado County Behavioral Health Division Quality Assurance/Utilization Review (QA/UR) Team to ensure all required elements are present in the next, and subsequent, Plan.</p>	
Finding #2	EI Dorado County’s Issue Resolution log lacked the required information regarding client disputes related to the provision of their MHSA funded mental health services. The Issue Resolution log contained the date the dispute was received; however, it lacked a brief synopsis of the issue, the final	Recommendation #2	<p>The County must develop and maintain an MHSA Issue Resolution log that contains the date the issue was received, a brief synopsis of the issue, the final resolution outcome and the date of the final resolution outcome.</p> <p>-----</p> <p>EI Dorado County’s Response:</p> <p>Corrective Action: The MHSA Team will update the MHSA Issue Resolution Log to include the required fields, and will update the Grievance Log to include a field to check for any grievances that relate to MHSA-funded programs.</p>	The submitted plan is accepted.

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	<p>resolution outcome and the date of the final resolution outcome. The submitted log had no entries of any reported client disputes. (County Performance Contract (6)(A)(2)).</p>	<p>Recommendation #2a</p>	<p>Timeline: The changes will be made by December 31, 2020. Evidence of Corrections: The MHSA Issue Resolution Log and the MHP Issue Resolution Log will provide evidence of corrections.</p> <p>Mechanisms for Monitoring Effectiveness: The total number of MHSA Issues and Grievances will be reported quarterly to the Quality Improvement Committee (QIC).</p> <p>The County must update the instructions in the County’s ‘MHSA Issue Resolution Procedure’ to include specific contact information for clients seeking issue resolution in filing a complaint or an appeal with the state entities Department of Health Care Services (DHCS), the Mental Health Services Oversight and Accountability Commission (MHSOAC) and California Mental Health Planning Council (CMHPC). The instructions omit contact information for the above mentioned entities (i.e., MHSA@dhcs.ca.gov) (per County submitted document titled: ‘MHSA EI Dorado County, County of EI Dorado Health and Human Services Agency Behavioral Health MHSA Issue Resolution Procedure’ (no date/page #s) located on page 2, (2)(vi). -----</p>	

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		Recommendation #2b	<p>EI Dorado County’s Response:</p> <p>Corrective Action: The MHSA Team will update the instructions on the County’s MHSA Issue Resolution Procedure to include specific contact information for clients seeking issue resolution in filing a complaint or an appeal with the identified entities.</p> <p>Timeline: The changes will be made and forms updated in the lobbies and online by December 31, 2020.</p> <p>Evidence of Corrections: The MHSA Issue Resolution Procedure will provide evidence of corrections.</p> <p>Mechanisms for Monitoring Effectiveness: The MHSA Team and the QA/UR Team will review the procedure to ensure all required information is present. The procedure will be scheduled for review upon a change in the requirements and annually to ensure the current elements are present.</p> <p>The County must provide training on the MHSA Issue Resolution process, to all County of EI Dorado Health and Human Services Agency Behavioral Health employees and those</p>	

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			<p>individuals and/or service providers who are the point of contact for the MHSA programs/services. ----- EI Dorado County’s Response:</p> <p>Corrective Action: The MHSA Team and the QA/UR Team will provide training on the MHSA Issue Resolution process, to all County of EI Dorado Health and Human Services Agency Behavioral Health employees and those individuals and/or service providers who are the point of contact for the MHSA programs/services.</p> <p>Timeline: By January 31, 2021</p> <p>Evidence of Corrections: The record of attendance will serve as the evidence of correction.</p> <p>Mechanisms for Monitoring Effectiveness: The number of MHSA Issue Resolution requests and MHSA-related Grievance Requests will be monitored and reported to the QIC quarterly. Training or distribution of information about this topic will be provided annually or more frequently if needed. The need will be determined by when a new hire joins the County Mental Health Plan, and</p>	

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		Recommendation #2c	<p>anytime there is a change in procedure or requirements.</p> <p>The County MHSA Issue Resolution Procedure must identify the process of service providers to notify the County of EI Dorado Health and Human Services Agency Behavioral Health of MHSA client disputes on a regular basis, and demonstrate those service providers were notified of the process and date of implementation.</p> <p>----- EI Dorado County’s Response:</p> <p>Corrective Action: The MHSA Team will update the instructions on the County’s MHSA Issue Resolution Procedure to include specific information for providers to notify the County of MHSA client disputes. The MHSA Team and the QA/UR Team will provide notification about the MHSA Issue Resolution process, to all County of EI Dorado Health and Human Services Agency Behavioral Health employees and to those individuals and/or service providers who are the point of contact for the MHSA programs/services.</p> <p>Timeline: By January 31, 2021</p>	

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		Recommendation #2d	<p>Evidence of Corrections: The updated MHSA Issue Resolution Procedure and copies of the notification will serve as the evidence of correction. The notification will also identify the date of implementation.</p> <p>Mechanisms for Monitoring Effectiveness: The number of MHSA Issue Resolution requests and MHSA-related Grievance Requests will be monitored and reported to the QIC quarterly. Training or distribution of information about this topic will be provided annually or more frequently if needed. The need will be determined by when a new hire joins the County Mental Health Plan, when a new contracted provider is engaged, and anytime there is a change in procedure or requirements.</p> <p>The County must demonstrate that the MHSA Issue Resolution log entries are reviewed on a regular basis.</p> <p>----- El Dorado County's Response: Corrective Action: The MHSA Team and the QA/UR Team will compile the MHSA Issue Resolution log entries for reporting to the QIC. Timeline:</p>	

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			<p>Information about the MHSA Issue Resolution log entries will be reviewed at the next QIC meeting, scheduled for December 1, 2020.</p> <p>Evidence of Corrections: Minutes from the quarterly QIC meetings will serve as the evidence of corrections.</p> <p>Mechanisms for Monitoring Effectiveness: The total number of MHSA Issues and Grievances will be reviewed by the QA/UR Team quarterly and reported quarterly to the QIC.</p>	
Finding #3	<p>EI Dorado 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 FY 2014 – 17 Plan and the FY 16-17 Annual Update (Update). (Cal. Code</p>	Recommendation #3	<p>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) in their approved FY 2020-23 Plan and FY 2020-21 Update and each subsequent Plan and Update thereafter.</p> <p>-----</p> <p>EI Dorado County’s Response:</p> <p>Corrective Action: EI Dorado County’s FY 2020-23 Plan includes the following outcome measure for the PEI Stigma and Discrimination Reduction Programs: “Using a validated method, measure one or more of the following: Changes in attitudes, knowledge, and/or behavior related to seeking mental health services that are applicable to the specific program” and “Changes in attitudes, knowledge, and/or behavior</p>	The submitted plan is accepted.

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	of Regs., tit. 9, §3750(d)).		<p>related to seeking mental health services that are applicable to the specific program.” EI Dorado County will utilize the “Retrospective Stigma and Discrimination Reduction Participant Survey” developed by California Institute for Behavioral Health Solutions/Measurements, Outcomes, and Quality Assessment (MOQA) research. Additionally, EI Dorado County will provide technical assistance to PEI-contracted service providers who administer the “Stigma and Discrimination Reduction” project.</p> <p>Timeline: Completed. EI Dorado County’s FY 2020-23 Plan includes the stated outcome measure.</p> <p>Evidence of Corrections: Prevention and Early Intervention (PEI) outcomes are reported annually in a companion document to the Plan / Annual Updates. This Outcomes document for FY 2020-21 will be provided as the evidence of corrections.</p> <p>Mechanisms for Monitoring Effectiveness: The PEI Outcomes document is prepared annually. Outcomes are discussed during the Community Program Planning Process (CPPP), and PEI outcomes are reported to the local Behavioral Health Commission</p>	

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Suggested Improvement #1	Community Program Planning Process (CPPP) Policies and Procedures	Suggested Improvement #1	<p>DHCS recommends the County incorporate all aspects of the current CPPP process into current County written policies and procedures and/or duty statements. This includes CPPP designated positions, staff training, stakeholder training, client and stakeholder outreach and involvement.</p> <p>-----</p> <p>EI Dorado County’s Response:</p> <p>Corrective Action: The “MHSA Program Desk Guide” identifies that the MHSA Analyst is responsible for the CPPP and includes a description of the CPPP elements. Additionally, EI Dorado County will develop a formal policy and procedure that incorporates all aspects Welfare and Institutions Code section 5848 regarding the CPPP.</p> <p>Timeline: The Policy and Procedure will be complete by March 1, 2021.</p> <p>Evidence of Corrections: The “MHSA Program Desk Guide” is attached to this response.</p> <p>Mechanisms for Monitoring Effectiveness: The MHSA Team will measure the effectiveness of the policy and procedure as part of its analysis</p>	The submitted plan is accepted.

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			of the CPPP and the input received as part of the CPPP, including but not limited to items such as the number of surveys completed, the number of participants, and the type of input received.	
Suggested Improvement #2	Transparency and Consistency	Suggested Improvement #2	<p>DHCS recommends the County’s MHPA program names detailed in the approved Plan, Update and Annual Revenue and Expenditure Report (ARER) must match; and programs place in the correct component based on regulations.</p> <p>-----</p> <p>EI Dorado County’s Response:</p> <p>Corrective Action: EI Dorado County’s most recently submitted ARER (for FY 18/19) includes these changes for most components, and all components will be corrected in all subsequent ARER submittals.</p> <p>Timeline: The FY 19/20 ARER will be submitted per the timelines established by DHCS. In the event an extension of time is needed, EI Dorado County will make that request in a timely manner to DHCS.</p> <p>Evidence of Corrections: The EI Dorado County FY 19/20 ARER, and subsequent RERs, provides evidence of completion.</p>	The submitted plan is accepted

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			<p>Mechanisms for Monitoring Effectiveness: The MHSA Team will review ARERs prepared by EI Dorado County’s Fiscal Team prior to submittal to the State, and compare the program designations to the associated MHSA Plan / Annual Update to verify consistency.</p>	
Suggested Improvement #3	Program Evaluation and Oversight	Suggested Improvement #3	<p>DHCS recommends routine evaluation of MHSA programs to include documentation of what is occurring and why, how, how well the programs are doing and how the program can be improved or improvement sustained.</p> <p>----- EI Dorado County’s Response:</p> <p>Corrective Action: The MHSA Team reviews and evaluates MHSA Prevention and Early Intervention projects on a monthly basis with invoice reviews; quarterly with Quarterly Report reviews; and annually with Annual Report reviews. Additionally, the MHSA Team provides regular technical assistance to contractors who require additional support, and the QA/UR Team provides ongoing technical assistance to contracted providers of MHSA-funded Specialty Mental Health (SMHS) services provided through MHSA CSS funding. Additionally, for MHSA CSS projects, assessment tools such as the Child and Adolescent Needs and</p>	The submitted plan is accepted

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		<p>Strengths (CANS) and the Child and Adolescent Level of Care Utilization System (CALOCUS) are used at initial intake and reassessment to evaluate if individuals are appropriately placed in the CSS program and making progress in their treatment.</p> <p>Overall MHSA outcomes are reported in the companion “Outcomes” document, which is published with the Plan / Annual Reports. The County also has hired an Analyst, who will also participate in Program Evaluation and Oversight functions, including routine evaluation of MHSA programs.</p> <p>Timeline: These activities have already been implemented.</p> <p>Evidence of Corrections: The MHSA Outcomes document will serve as evidence of corrections, along with other regular reporting, such as the reauthorization process (redacted), monthly reporting to the Behavioral Health Commission, and other outcome-related reporting that may occur throughout the year.</p> <p>Mechanisms for Monitoring Effectiveness: Annual program evaluation is performed for the Outcomes document and utilization review is performed by the QA/UR Team.</p>	

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Suggested Improvement #4	Improved Relationships	Suggested Improvement #4	<p>DHCS recommends the county nurture relationships with service providers and foster open communication. Service providers were informative and felt there was minimal interaction with the behavioral health staff and lack of county transparency.</p> <p>-----</p> <p>El Dorado County's Response: Corrective Action: The Children's QA/UR Team has a standing weekly meeting with all contracted SMHS children and youth providers. The QA/UR Team provides documentation training to providers to help improve transparency and to facilitate understanding of Medi-Cal requirements. The QA/UR team is able to contact providers via email, telephone, and text, at any time and respond within 24 hours. The QA/UR Team and Outpatient leadership meet with Telecare Corporation (which operates the El Dorado County Psychiatric Health Facility (PHF)) on a monthly basis, and communicates with Telecare leadership and staff throughout the week to address any issues that may arise, develop/revise procedural documentation, and refer clients for services. Further, the MHSA Team talks with and provides technical assistance to the Prevention and Early</p>	The submitted plan is accepted

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			<p>Intervention (PEI) contracted providers on a regular basis. Additionally, some contracted service providers regularly attend and participate in El Dorado County’s Behavioral Health Commission meetings, the MHSA CPPP and the MHSA Public Hearing. For greater transparency, contracted service providers will be invited to participate in the Mental Health Plan’s QIC starting with the next meeting. And finally, through a Continuous Quality Improvement (CQI) Committee, the County’s Health and Human Services Agency has revised and improved invoicing and contracting procedures. Contracted service providers were surveyed so that their input was included in the Continuous Quality Improvement project. Part of the improvement plan is meeting with providers prior to execution of the contract to review requirements, a designated Fiscal staff member for contacting with questions, and a streamlined process for submitting invoices.</p> <p>Timeline: These efforts have already been implemented.</p> <p>Evidence of Corrections:</p>	

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		Suggested Improvement #4a	<p>Calendar appointments, sign in sheets, and/or meeting minutes may be provided as evidence of corrections.</p> <p>Mechanisms for Monitoring Effectiveness: Providers will be involved in the quarterly QIC. The QA/UR Team and the MHSA Team will continue to communicate regularly with providers. The MHSA Team will consider implementation of a provider satisfaction survey on a regular basis, similar to what was implemented during the CQI process.</p> <p>DHCS recommends improved communication with housing service providers regarding county contact information and on-going supportive client support for all MHSA housing clients. The housing complex was unaware whom to contact at the county regarding unruly client behaviors and law enforcement issues.</p> <p>----- El Dorado County's Response:</p> <p>Corrective Action: Each housing complex that provides MHSA housing has a calendar that is updated weekly with phone numbers of the following on-call individuals: Manager, Clinician, Mental Health</p>	

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			<p>Worker, and Crisis Worker. Also posted at each complex are phone numbers for the on-call Public Guardian and law enforcement. Additionally, the MHSA Team remains in contact with the property management teams, but will encourage the property management teams to ensure their onsite staff are aware as to whom to contact for issues that may arise.</p> <p>Timeline: Completed. The calendars are posted at each housing complex each week.</p> <p>Evidence of Corrections: A copy of a calendar is provided as evidence of completion.</p> <p>Mechanisms for Monitoring Effectiveness: The MHSA Team will continue to be in contact with representatives from the housing developments.</p>	