

Merced County Plan of Correction
Per the Performance Contract Review Report for Review Dates September 9-11, 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	Merced County did not submit the adopted FY 2017-20 Three-Year Program and Expenditure Plan (Plan) and FY 2018-19 Annual Update (Update) to the Department of Health Care Services (DHCS) within 30 days after adoption. (Welfare and Institutions (W&I) Code, section 5847(a)).	Recommendation # 1	<p>The County shall submit the approved FY 2020-23 Plan and FY 2019-20 Update to DHCS at MHS@dhcs.ca.gov and the Mental Health Oversight and Accountability Commission (MHSOAC) within 30 days of adoption by the County Board of Supervisors, and each subsequent Plan and Update thereafter.</p> <p>a) Merced County did not submit adopted Annual Updates or Three-Year Plans to both DHCS and MHSOAC within 30 days after adoption.</p> <p>b) Merced County will submit the adopted FY 2020-23 Plan and FY 2019-20 Update to both DHCS via email and MHSOAC via ShareFile upload</p> <p>c) Merced County will submit approved Three-Year Plans and Annual Updates to both DHCS and MHSOAC along with Board Resolutions, County Certification Forms and Fiscal Certification Forms.</p> <p>d) Timeline: Merced County will submit the adopted 2019-2020 Annual Update to DHCS and MHSOAC before June 30, 2020, the adopted 2020-2023 Three-Year Plan by June 30, 2021 and each subsequent update/plan to both agencies by June 30th of that fiscal year.</p> <p>e) Merced County will maintain copies of the update/plan submittal emails to DHCS, the</p>	The submitted plan is accepted.

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			<p>confirmation of receipt emails from DHCS, a screen shot of the ShareFile upload to MHSOAC and any confirmation of receipt emails received from MHSOAC or ShareFile.</p> <p>f) Update Merced County Behavioral Health and Recovery Services Policy and Procedure No. I.I.002, titled MHSA Community Planning Process, to state that updates/plans will be submitted to both the DHCS and the MHSOAC. Also, include the steps for the submittal process as part of the timeline within each update or plan.</p> <p>g) Not applicable as this corrective action does not impact Merced County's contracted service providers.</p>	
Finding #2	Merced County's assessment of its capacity to implement proposed programs/services did not include an assessment of the strengths and limitations of the County and service providers that impact their ability to meet the needs of racially and ethnically diverse populations; including	Recommendation # 2	<p>The County must will provide an assessment of their capacity to implement proposed programs/services and evaluate the capacity of service providers to meet the needs of diverse, cultural, racial/ethnic, and linguistic groups and address all components of Cal. Code Regs., Title 9, § 3650(a) in the approved FY 2020-23 Plan and each subsequent Plan thereafter.</p> <p>a) Merced County requires a capacity needs assessment that shows the strengths and limitations of existing programs and evaluates their ability to meet the needs of diverse populations and address barriers to services.</p>	The submitted plan is accepted.

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	<p>identification of possible barriers to program implementation and methods to overcome these barriers. (California Code of Regulations, Title 9, section 3650(a)(5)(A)(C)).</p>		<p>b) Merced County will develop a needs assessment to determine the impact of MHSA programs and services, the capacity to meet the culturally diverse needs of the county; and to identify barriers to services and resolution to these barriers.</p> <p>c) Merced County will secure a consultant to develop and implement a capacity needs assessment, to address all components of Cal. Code Regs., Title 9, § 3650(a) and to prepare a report of the findings.</p> <p>d) Timeline: Merced County will secure a consultant by June 30, 2020, begin the needs assessment process by July 1, 2020, require task deliverables, including an initial report by November 30, 2020 and include any of the report findings in the 2020-2023 Three-Year Plan by June 30, 2021 as well as any further findings in subsequent Updates/Plans.</p> <p>e) Merced County will include the capacity needs assessment report in the approved FY 2020-23 Plan, which will be submitted to both DHCS and MHSOAC, as well as include any further findings in subsequent Updates/Plans thereafter.</p> <p>f) Merced County Behavioral Health and Recovery Services will follow and update as necessary Policy and Procedure No. I.I.001, titled MHSA Capacity, in order to maintain an ongoing process to evaluate the strengths,</p>	

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			<p>limitations, impact of and barriers to program services in Merced County.</p> <p>g) Merced County’s contracted MHSA service providers will be integral to the development of a comprehensive needs assessment through their cooperation with the consultant, participation in the evaluation process and implementation of improvements resulting from the needs assessment.</p>	
Finding #3	<p>Merced County did not report the estimated number of clients the County plans to serve in each Full Service Partnership (FSP) targeted age group (Child, Transitional Age Youth, Adult, and Older Adult) in the adopted FY 2017-20 Plan. (Cal. Code Regs., Title 9, § 3650(a)(3))</p>	Recommendation # 3	<p>The County will report the number of FSP clients the County plans to serve in each age group: children (age 0-15), transitional age youth (age 16- 25), adult (age 26-59) and older adult (age 60 and older) for each fiscal year of the adopted FY 2020-23 Plan and thereafter.</p> <p>a) Merced County did not report in the 2017-2020 Plan the estimated number of FSP clients the County planned to serve each fiscal year in each age group.</p> <p>b) Merced County must report by age group the number of FSP clients to be served each fiscal year in the FY 2020-23 Plan.</p> <p>c) Merced County will include in the FY 2020-23 Plan the estimated number of FSP clients the County plans to serve in each identified age group for each fiscal year of the Plan and in any plans/updates thereafter.</p> <p>d) Timeline: Merced County will report in the FY 2020-23 Plan the estimated number of FSP clients by identified age group that the</p>	The submitted plan is accepted.

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			<p>County plans to serve in each fiscal year of the Plan. This Three-Year Plan will be submitted to DHCS and MHSOAC by June 30, 2021. Merced County has already included in the FY 2019-2020 Annual Update the estimated number of FSP clients the County plans to serve in 2019-2020 which is pending adoption and will be submitted to DHCS and MHSOAC by June 30, 2020.</p> <p>e) Merced County will maintain copies of the 2020-2023 Plan and the 2019-2020 Annual Update that include the estimated number of FSP clients by identified age group that the County plans to serve in each fiscal year. The Plan and Annual Update will also be submitted to DHCS, MHSOAC and will be posted on the Merced County website on the Mental Health Services Act webpage.</p> <p>f) Merced County will monitor that each future Three-Year Plan and Annual Update includes the estimated number of FSP clients by identified age group that the County plans to serve in each fiscal year.</p> <p>g) Merced County will consult with the contracted providers of our FSP Programs to determine the estimated number of FSP client to be served in each fiscal year.</p>	
Finding #4	Merced County's approved FY 2017-20 Plan and FY 2018-19	Recommendation # 4	The County shall identify each Program funded with PEI funds as a Prevention Program, an Early Intervention Program, Outreach for	The submitted plan is accepted.

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	Update did not clearly identify which Prevention and Early Intervention (PEI) programs fall under each PEI program category. (Cal. Code Regs., Title 9, § 3755(L)(2)).		<p>Increasing Recognition of Early Signs of Mental Illness Program, Stigma and Discrimination Reduction Program, Suicide Prevention Program (if applicable), or Access and Linkage to Treatment Program, in the FY 2020-23 Plan and FY 2019-20 Update and each subsequent Plan and Update thereafter.</p> <p>a) Merced County did not identify which Prevention and Early Intervention (PEI) programs fall under each PEI program category in the 2017-2020 Plan or the 2018-2019 Annual Update.</p> <p>b) Merced County must will identify which Prevention and Early Intervention (PEI) programs fall under each PEI program category in the FY 2020-23 Plan, the 2019-2020 Annual Update and each plan or update thereafter.</p> <p>c) Merced County will identify in the FY 2020-23 Plan which Prevention and Early Intervention (PEI) programs fall under each PEI program category and in any plans/updates thereafter. In the 2019-2020 Annual Update Merced County identified the need to categorize each PEI program and the action plan to do so in the 2020-23 Plan.</p> <p>d) Timeline: Merced County will report in the FY 2020-23 Plan which Prevention and Early Intervention (PEI) programs fall under each PEI program category This Three-Year</p>	

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			<p>Plan will be submitted to DHCS and MHSOAC by June 30, 2021.</p> <p>e) Merced County will maintain copies of the 2020-2023 Plan in which we identify which Prevention and Early Intervention (PEI) programs fall under each PEI program category. The Plan will also be submitted to DHCS, MHSOAC and will be posted on the Merced County website on the Mental Health Services Act webpage.</p> <p>f) Merced County will monitor that each Three-Year Plan and Annual Update developed hereafter, clearly shows which Prevention and Early Intervention (PEI) programs fall under each PEI program category; and develop a PEI Policy and Procedure that includes the identification and reporting of each program by PEI category.</p> <p>g) Merced County will consult with the contracted providers of our PEI Programs to ensure that each provider can identify and report their program’s PEI program category or categories.</p>	
Suggested Improvement #1a	DHCS recommends programs indicated in the adopted Plan and Update as stand-alone programs (e.g. has distinct program descriptions,	Improvement # 1a	<p>Improvement Summary and Corrective Actions:</p> <p>a) Merced County did not present stand-alone programs identified in adopted Plans and Updates as individual line items in the approved Plan/Update budget or the ARER.</p> <p>b) For those programs indicated in the adopted Plan and Update as stand-alone</p>	The submitted plan is accepted.

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	<p>performance outcomes, etc.) be presented as individual line items in the approved Plan/Update budget and Annual Revenue and Expenditure Report (ARER).</p>		<p>programs (e.g. has distinct program descriptions, performance outcomes, etc.), Merced County must will present those programs as individual line items in the approved Plan/Update budget and Annual Revenue and Expenditure Report (ARER).</p> <p>c) In the 2018-2019 ARER and in the 2019-2020 Annual Update Budget Summary pages, Merced County has detailed as individual line items those stand-alone programs with distinct program descriptions and outcomes. Merced County will continue to provide such individual program detail in the 2020-23 Plan and future ARER, Plans and Updates.</p> <p>d) Timeline: Merced County’s 2018-2019 ARER, was submitted to DHCS by 12/31/2019, and the 2019-2020 Annual Update, which is currently pending adoption, will be submitted to DHCS and MHSOAC by June 30, 2020. In both documents Merced County has detailed as individual line items those stand-alone programs with distinct program descriptions and outcomes.</p> <p>e) Merced County will maintain copies of ARER, Plans and Updates on file. These documents will also be submitted to DHCS, MHSOAC and will be posted on the Merced County website on the Mental Health Services Act webpage.</p>	

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			f) Merced County will monitor that each ARER and Plan/Update Budget Summary details as individual line items those stand-alone programs with distinct program descriptions and outcomes. g) Not applicable to County’s contracted providers of services.	
Suggested Improvement #1b	DHCS recommends program names and service categories detailed in the approved Plan and Update match the program names and service categories in the ARER.	Improvement # 1b	Improvement Summary and Corrective Actions: a) Merced County’s program names and service categories detailed in the approved Plan and Update do not match the program names and service categories in the ARER. b) Merced County’s program names and service categories detailed in the approved Plan or Update and Update should match the program names and service categories in the ARER. c) In the 2018-2019 ARER, Merced County matched the program names and service categories to those stated in the 2019-2020 Annual Update. Merced County will continue to match program names and service categories in future ARER, Plans and Updates. d) Timeline: Merced County’s 2018-2019 ARER, was submitted to DHCS by 12/31/2019, and the 2019-2020 Annual Update, which is currently pending adoption, will be submitted to DHCS and MHSOAC by June 30, 2020. In both documents Merced County has matched program names and service categories and will	The submitted plan is accepted.

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			<p>continue to do so in future ARER, Plans and Updates.</p> <p>e) Merced County will maintain copies of ARER, Plans and Updates on file. These documents will also be submitted to DHCS, MHSOAC and will be posted on the Merced County website on the Mental Health Services Act webpage.</p> <p>f) Merced County will monitor that service categories detailed in the approved Plan or Update match the program names and service categories in the ARER.</p> <p>g) Not applicable to County’s contracted providers of services.</p>	
Suggested Improvement #1c	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.	Improvement # 1c	<p>Improvement Summary and Corrective Actions:</p> <p>a) Merced County’s ARER has not been consistent with the budget in the approved Plan and Update.</p> <p>b) Merced County’s 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.</p> <p>c) In the 2018-2019 ARER, Merced County reported individual program expenses by line item to align with the detailed budgeted amounts by program listed on pages 177-179 of the 2018-2019 approved Annual Update. Merced County will continue to align future</p>	The submitted plan is accepted.

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			<p>ARERs with the program budgets in future Plans and Updates.</p> <p>d) Timeline: Merced County’s 2018-2019 ARER, was submitted to DHCS by 12/31/2019, and the 2018-2019 Annual Update was submitted to DHCS and MHSOAC on February 4, 2019. Merced County made the ARER consistent with the budgeted program amounts listed on pages 177-179 of the 2018-2019 Annual Update and will continue to ensure alignment of budgets and amounts on future ARER and Plans and Updates.</p> <p>e) Merced County will maintain copies of ARER, Plans and Updates on file. These documents will also be submitted to DHCS, MHSOAC and will be posted on the Merced County website on the Mental Health Services Act webpage.</p> <p>f) Merced County will monitor that the ARER is consistent with the budget in the approved Plan and Update.</p> <p>g) Not applicable to County’s contracted providers of services.</p>	
Suggested Improvement #1d	DHCS recommends the County include a description of the Innovation (INN) project Community Program Planning Process (CPPP)	Improvement # 1d	<p>Improvement Summary and Corrective Actions:</p> <p>a) DHCS recommends that Merced County include a description of the Innovation (INN) project Community Program Planning Process (CPPP) within the approved Plan and Update, including project evaluation process and decision-making regarding whether to continue</p>	The submitted plan is accepted.

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	<p>within the approved Plan and Update. This description should include the INN project evaluation process and decision-making regarding whether to continue the INN project, or elements of the project, without INN funds.</p>		<p>the INN project, or elements of the project, without INN funds.</p> <p>b) Merced County’s should include a description of the Innovation (INN) project Community Program Planning Process (CPPP) within the approved Plan and Update</p> <p>c) In the 2019-2020 Annual Update, which is currently pending adoption, Merced County included updates on the progress of the Innovation Project. Also attached to the Update as Exhibit A is the MHSA Innovative Strategist Network Evaluation Plan, as prepared by our evaluation consultant, Resource Development Associates. In December of 2019 Merced County also submitted to DHCS and MHSOAC the MHSA Innovative Strategist Network Year 1 Evaluation Report. The Year 1 Report describes implementation of the Innovation Project, including evaluation of the project, Community Planning Process activities, including summaries of focus groups and consumer feedback. The Year 2 Evaluation Report will be included within the 2020-23 Plan as will future reports be included in future Plans and Updates.</p> <p>d) Timeline: Merced County’s 2019-2020 Annual Update is pending adoption and will be submitted to DHCS and MHSOAC by June 30, 2020. The MHSA Innovative Strategist</p>	

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			<p>Network Year 1 Evaluation Report was submitted to DHCS and MHSOAC on December 23, 2019. All future Innovation reports and finding will be submitted in future Plans and Updates.</p> <p>e) Merced County will maintain copies of all Innovation Reports, Plans and Updates on file. These documents will also be submitted to DHCS, MHSOAC and will be posted on the Merced County website on the Mental Health Services Act webpage.</p> <p>f) Merced County will monitor the approved Plan and Update to ensure that they include a description of the Innovation (INN) project Community Program Planning Process (CPPP) within. This description will include the INN project evaluation process and decision-making regarding whether to continue the INN project, or elements of the project, without INN funds.</p> <p>g) Merced County implements the Innovative Strategist Network-Youth Program through a contracted provider, and Merced County will continue to coordinate CPPP, project implementation and project evaluation with this provider.</p>	
Suggested Improvement #2a	DHCS recommends the County develop policies and	Improvement # 2a	Improvement Summary and Corrective Actions:	The submitted plan is accepted.

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	procedures on their CPPP.	<p>a) DHCS recommends the County develop policies and procedures on their Community Program Planning Process (CPPP).</p> <p>b) Merced County's should have more developed and clearer policies and procedures on their CPPP.</p> <p>c) Since January 2020 Merced County has expanded the CPPP to include CPPP trainings as part of Behavioral Health and Recovery Services' New Employee Orientation, covering MHSA, CPPP, Issue Resolution Process, stakeholder and consumer participation. The existing Policy and Procedure No. I.I.002, titled MHSA Community Planning Process, will be updated to include these new CPPP efforts and requirements.</p> <p>d) Timeline: Merced County began providing more comprehensive CPPP training as part of New Employee Orientation as of January 2020. Also, Policy and Procedure No. I.I.002 will be updated by June 30, 2020.</p> <p>e) Merced County will maintain copies Policies and Procedures on file, as well as documentation of CPPP trainings, PowerPoints, sign-in sheets, etc.</p> <p>f) Merced County will monitor that the CPPP Policies and Procedures are up to date and that the requirements are being followed and documented.</p>	

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			g) Not applicable to County’s contracted providers of services.	
Suggested Improvement #2b	DHCS recommends the County detail stakeholder demographics (e.g. age, ethnicity, gender, geographic location, etc.) and compare stakeholder demographics to overall County demographics to ensure desired participation of target populations in the CPPP and determine whether stakeholders reflect the diversity of the demographics of the County. DHCS recommends the County include stakeholder demographics, County demographics, and the comparison of both demographics	Improvement # 2b	Improvement Summary and Corrective Actions: a) DHCS recommends the County detail stakeholder demographics and compare stakeholder demographics to overall County demographics to ensure desired participation of target populations in the CPPP and determine whether stakeholders reflect the diversity of the demographics of the County. DHCS recommends the County include stakeholder demographics, County demographics, and the comparison of both demographics within the approved Plan and Updates. b) Merced County’s should detail stakeholder and CPPP demographics and compare to County demographics to identify gaps in representation; and include this data and comparison in the Plans and Updates. c) In the 2019-2020 MHSA Annual Update, which is pending adoption, Merced County detailed the demographic data of stakeholders who participated in the CPPP, did a side-by-side comparison with overall County demographics and made determinations about the diversity of representation, both goals being met and the identified gaps in participants to be addressed. Merced County will continue to analyze, compare, present and address	The submitted plan is accepted.

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	within the approved Plan and Updates.		<p>stakeholder demographics in future Plans and Updates to ensure diversity and desired participation of target populations in the CPPP. This process will be added to Policy and Procedure No. I.I.002, titled MHPA Community Planning Process.</p> <p>d) Timeline: Merced County’s 2019-2020 MHPA Annual Update, which is pending adoption, will be submitted to DHCS and MHPAC by June 30, 2020. Merced County will also update Policy and Procedure No. I.I.002 by June 30, 2020.</p> <p>e) Merced County will maintain copies of Plans, Updates and Policies and Procedures on file, as well as documentation of CPPP demographics, including sign-in sheets and participant documentation.</p> <p>f) Merced County will monitor that Plans and Updates include stakeholder demographics, County demographics and an analysis comparing the data to determine gaps in representation, as well as ensuring that the CPPP Policies and Procedures are up to date and that the requirements are being followed and documented.</p> <p>g) Not applicable to County’s contracted providers of services.</p>	
Suggested Improvement #2c	DHCS recommends the County include a	Improvement # 2c	Improvement Summary and Corrective Actions:	The submitted plan is accepted.

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	<p>summary of results from CPPP meetings and discussions within the approved Plan and Update, including a summary of public comments and responses. County should address all public comments and responses within the approved Plan and Updates.</p>		<p>a) DHCS recommends the County include a summary of results from CPPP meetings and discussions within the approved Plan and Update, including a summary of public comments and responses. County should address all public comments and responses within the approved Plan and Updates.</p> <p>b) Merced County's should provide a summary of CPPP meeting discussions and provide public comments and responses to the public comments within the Plans and Updates.</p> <p>c) In the 2019-2020 MHSA Annual Update, which is pending adoption, Merced County started to include responses to written Public Comments received as part of the CPPP. Merced County will improve on this process in the FY 2020-23 Plan and future Plans/Updates by including a Summary of results from CPPP meetings and discussions, as well as presenting both the public comments and the County's response to those comments. The existing Policy and Procedure No. I.I.002, titled MHSA Community Planning Process, will be updated to include these new CPPP efforts to summarize meeting points and present public comments and County responses.</p> <p>d) Timeline: Merced County began including responses to written Public Comments in the MHSA 2019-2020 Annual Update, which will be submitted to DHCS and</p>	

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			<p>MHSOAC by June, 30, 2020. In the 2020-23 Plan Merced County will summarize results from CPPP meetings and discussions, as well as presenting both the written and spoken public comments and the County's response to those comments. Also, Policy and Procedure No. I.I.002 will be updated by June 30, 2020.</p> <p>e) Merced County will maintain copies of Plans, Updates and Policies and Procedures on file, as well as documentation of CPPP minutes and public comments and responses.</p> <p>f) Merced County will monitor Plans and Updates, to ensure inclusion of Summaries of CPPP meetings and discussion, public comments and County's response to public comments, as well as ensuring that the that the CPPP Policies and Procedures are up to date and that the requirements are being followed and documented.</p> <p>g) Not applicable to County's contracted providers of services.</p>	
Suggested Improvement #3	DHCS recommends the County update existing FSP policies and procedures to include the client's role in developing the goals stated in the Individual Services	Improvement # 3	<p>Improvement Summary and Corrective Actions:</p> <p>a) DHCS recommends the County update existing Full Service Partnership (FSP) policies and procedures to include the client's role in developing the goals stated in the Individual Services and Support Plans (ISSP)/Client Plan of Care (CPC)/Treatment Plans.</p>	The submitted plan is accepted.

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	and Support Plans (ISSP)/Client Plan of Care/Treatment Plans.	<p>b) Merced County should work with contract providers to update existing FSP policies and procedures to include the client’s role in developing the goals stated in the ISSP/CPC/Treatment Plans.</p> <p>c) Merced County’s FSP for Children is implemented by Aspiranet. Aspiranet has an established Policy and Procedure BH-FSP-10, titled Program Client Service Planning, which clearly defines the client’s role in developing the goals stated in the ISSP/CPC/Treatment Plans and states that staff prepare, with the client and family/guardians, as appropriate, a service plan of care based on an assessment of the client’s needs, goals, preferences and strengths.</p> <p>The FSP for Adults is implemented by Turning Point Community Programs (TPCP). TPCP revised their Policy and Procedure, titled Intake and Assessment, on October 4, 2019. The revised policy and procedure now states that on the CPC the goals, objectives, and interventions will be identified and develop by the client and C.A.R.E. staff member. It will be a partnership care plan authorized by the client.</p> <p>d) Timeline: The FSP Policy and Procedure for each FSP provider is established and kept on file with Merced County.</p> <p>e) Merced County keeps on file copies of the relevant FSP Policies and Procedures of</p>	

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			<p>Aspiranet and TPCP, and will provide copies to DHCS or MHSOAC upon request.</p> <p>f) Merced County will maintain copies of the relevant FSP Policies and Procedures of Aspiranet and TPCP</p> <p>g) Merced County provides program oversight to all MHSA funded programs and will monitor that the relevant FSP Policies and Procedures are current and up to date.</p> <p>h) Merced County has worked and will continue to work with our FSP Contracted Providers to ensure that the relevant FSP Policies and Procedures are up to date, client-driven and designed to meet the needs of the clients being served.</p>	