

**Sierra Plan of Correction**  
**Per the County Performance Contract Review Report for Review Dates Date May 21-22, 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	Sierra 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	Sierra County will ensure that ARERs are submitted no later than December 31, following the end of the fiscal year. a) Develop a policy & procedure by 09-30-20 addressing the due date of the RER corresponding with the ARER date allowing for the ARER to be submitted by December 31, following the end of the year (Submit P&P) b) Develop a policy & procedure by 09-30-20 to ensure the due date of future ARERs are submitted by December 31, following the end of the fiscal year. (Submit P&P)	The submitted plan is accepted.
Finding # 2	Sierra County lacked a narrative analysis that assesses 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 the	Recommendation # 2	Sierra County has included 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. See attachment.	The submitted plan is accepted.

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	proposed programs/services in their adopted FY 2017-20 Three-Year Program and Expenditure Plan (Plan). (Cal. Code Regs., tit. 9, § 3650(a)(5)).			
Finding # 3	Sierra 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. (Cal. Code of Regs., tit. 9, § 3650(a)(3)).	Recommendation # 3	<p>The County must report the number of FSP clients the County plans 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 of the adopted FY 2020-23 Plan and thereafter.</p> <p>Under the FSP program Sierra County plans to serve the following estimated number of clients:</p> <p>Children (0-15) – 1 individual or family            Transitional Age Youth (16-25) – 1 individual or family            Adult (26-59) – 9            Older Adult (60 and older) – 2</p> <p>The number will be assessed during each annual update community planning process where needs will be assessed.</p>	The submitted plan is accepted.

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Finding # 4	Sierra County did not have a MHSA Issue Resolution Log (IRL) to record issues submitted as part of the Issue Resolution Process (County Performance Contract (6.)(A.)(2)).	Recommendation # 4	The County must develop and maintain an MHSA Issue Resolution Log that contains the date the issue or complaint was received, brief synopsis of the issue, final issue resolution outcome and date the final resolution was reached. The County policy and procedure (revised 1-4-19) and algorithm flowchart (dated 10-1-15) requires updating with inclusion of the IRL. Update will be completed by September 1, 2020.	The submitted plan is accepted.
		Recommendation # 4a	Recommendation #4a: The County will provide training on the MHSA Issue Resolution Process to all Sierra County Behavioral Health Service employees and those individuals and/or service providers who are the point of contact for MHSA programs/services. Training will be provided by October 30, 2020. Training Materials and attendance roster will be submitted to DHCS upon completion of training.	
		Recommendation # 4b	Recommendation #4b: The County MHSA Issue Resolution Policy and Procedure will identify the process for	

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			service providers to notify the Sierra County Behavioral Health Services of MHPA issues. Changes to the Policy and Procedure addressing this issue will be made by September 1, 2020.	
Finding # 5	Sierra County's adopted FY 2017-20 Plan and FY 2018-19 Update did not include reports on achievement of performance outcomes for MHPA services. (Welfare and Institution (W&I) Code, Section 5848(c); County Performance Contract (6)(A)(5)(d)).	Recommendation # 5	<p>The County must develop and implement policies and procedures to ensure data is collected and analyzed to report on its achievement of performance outcomes for services provided. The adopted FY 2020-23 Plan and FY 2019-20 Annual Update (Update), shall include reports of achievement of performance outcomes for MHPA services provided; and for each subsequent Plan and Update thereafter.</p> <ul style="list-style-type: none"> <li>a) Policies and procedures will be developed and approved by September 30, 2020.</li> <li>b) Sierra County is evaluating utilizing CANS and ANSA as tools to evaluate performance outcomes.</li> </ul>	The submitted plan is accepted.
Finding # 6	Sierra County lacked evidence of the use of a validated method to measure changes in	Recommendation # 6	<p>Sierra County will be working with MHPSOAC to determine a validated method to measure attitudes.</p> <ul style="list-style-type: none"> <li>a) Contact will be made by</li> </ul>	The submitted plan is accepted.

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	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 2017-20 Plan and FY 2018-19 Update. (Cal. Code Regs., tit. 9, §§ 3750(d), 3755(f)(3)).		December 31, 2020 to identify a validated method. b) the validated method will be in use by January 31, 2021 c) Policies and Procedures will be written to support the need for contractors to utilize the validated method. Policies and Procedures will be written and finalized by March 30, 2021.	
Finding # 7	Sierra County did not dedicate at least 51% of Prevention and Early Intervention (PEI) funds to serve individuals 25 years or younger in FY 2017-18. (Cal. Code Regs., tit. 9, § 3706(b)).	Recommendation # 7	In accordance with Cal. Code Regs., tit 9, § 3706(d) a small county may opt out of the 51% PEI funds serving individuals 25 years or younger. Sierra County has obtained the required resolution and gone through the community planning process to legitimately opt-out of the Cal. Code Regs., tit. 9 § 3706(b).  On March 19, 2019 Sierra County Board of Supervisors passed Resolution No. 2019-039 In the Matter of Opting Out of	The submitted plan is accepted.

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			<p>the Mental Health Services Act Requirement Stating at Least 51% Percent of the Prevention and Early Intervention (PEI) Fund Shall be Used to Serve Individuals Who are 25 Years Old or Younger.</p> <p>Sierra County will continue to opt-out until a community planning process indicates a need to change the funding structure.</p> <p>The County shall serve all ages in one or more Programs of the Prevention and Early Intervention Component.</p> <p>(b) At least 51 percent of the Prevention and Early Intervention Fund shall be used to serve individuals who are 25 years old or younger.</p> <p>(c) Programs that serve parents, caregivers, or family members with the goal of addressing MHSA outcomes for children or youth at risk of or with early onset of a mental illness can be counted as meeting the requirements in (a) and (b) above.</p> <p>(d) A Small County may opt out of the requirements in (a) and/or (b) above if:</p> <p>(1) The Small County obtains a</p>	

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			<p>declaration from the Board of Supervisors that the County cannot meet the requirements because of specified local conditions.</p> <p>(e) A Small County that opts out of the requirements in (a) and/or (b) shall include in its Three-year Program and Expenditure Plan and/or Annual Update documentation describing the rationale for the County's decision and how the County ensured meaningful stakeholder involvement in the decision to opt out.</p>	
Suggested Improvement Item #1	CPPP Training and Oversight	<p>Suggested Improvement #1</p> <p>Department of Care Services (DHCS) recommends th County incorporate all aspects of the current CPPP into formalized written policies, procedures and duty statements. This includes CPPP designated positions, staff training, stakeholder training, client and</p>	<p>1) Sierra County Behavioral Health will have written CPPP policies, procedures and duty statements by November 30, 2020.</p> <p>1.a.)Copies of the CPPP policies, procedures and duty statements will be submitted to DHCS by December 30, 2020.</p> <p>2) A training powerpoint used to train clients, staff and stakeholders will be developed by December 30, 2020.</p> <p>2.a.) The training powerpoint will be submitted to DHCS by January 30, 2021.</p>	The submitted plan is accepted.

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		stakeholder outreach and involvement.		
Suggested Improvement Item #1a	CPPP Training and Oversight	Suggested Improvement Item #1a  DHCS recommends the County provide training of MHPA program Policies and Procedures to all behavioral health employees and service providers involved in the complete delivery of services to recipients of MHPA programs	1) Sierra County Behavioral Health will conduct trainings regarding MHPA program policies and procedures to all behavioral health employees and services providers.  1.a.) Sierra County Behavioral Health will conduct the trainings once policies and procedures have been completed and approved. Policies and procedures will be written by May 2021.  1.b.) Training will take place during June and July of 2021.  1.c) Sierra County Behavioral Health will submit training sign-in sheets to DHCS by August 31, 2021.	The submitted plan is accepted.
Suggested Improvement Item #1b	CPPP Training and Oversight	Suggested Improvement Item #1b  DHCS recommends the County ensure it consistently receives	Sierra County will create policies and procedures around maintaining CPPP documents. Policies and procedures will be created by December 30, 2020.  Policies and procedures will be submitted to DHCS by January 30, 2021.	The submitted plan is accepted.

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		and retains training materials, sign-in sheets (dated), surveys, feedback, and other participation documentation	Training materials, redacted, dated sign-in sheets, surveys, feedback, and other participation documentation will be submitted to DHCS through Three-year plan and Annual Update submissions starting in July of 2021.	
Suggested Improvement Item #1c	CPPP Training and Oversight	Suggested Improvement Item #1c  DHCS recommends the County design a meeting minute template that indicates the dates the meeting held, stakeholders present (organization, agency, consumer, etc.), agenda items discussed with actions taken, completion dates, any resolutions and items to be placed on the next meeting agenda.	Sierra County Behavioral Health currently keeps meeting minutes with the listed information. However, the current template is not acceptable to DHCS. Therefore, Sierra County Behavioral Health will be contacting MHSOAC to develop a template acceptable to DHCS.  This template will be obtained by June 30, 2021	The submitted plan is accepted

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Suggested Improvement Item #1d	CPPP Training and Oversight	Suggested Improvement Item #1d  DHCS recommends the County identify stakeholders with limited participation and strategize how to increase participation	Sierra County Behavioral Health will continue to document strategies to identify and increase participation of stakeholders.  MHSA Steering Committee will be utilized as a vehicle to identify and increase participation of stakeholders. Minutes will be kept as proof of strategizing and identifying.	The submitted plan is accepted
Suggested Improvement Item #2	MHSA Transparency and Consistency	Suggested Improvement Item #2  DHCS recommends the County's MHSA program names detailed in the approved Plan and Update match the program names in the budget and ARER.	As of the Sierra County 2018/19 ARER due diligence has taken place to confirm MHSA program names match program names in the ARER. Fiscal and program staff will continue to work closely to maintain correct program names are reported within the ARER.  A policy and procedure will be written to ensure this process continues to take place. The policy will be written by December 30, 2020.  Policy will be submitted to DHCS by January 30, 2021.	The submitted plan is accepted
Suggested Improvement Item #2a	MHSA Transparency and Consistency	Suggested Improvement Item #2a	Please see the pages from the submitted 18-19 RER showing Program or service was reported with zero amounts and program names.	The submitted plan is accepted

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		DHCS recommends the ARER be consistent with the budget in the approved Plan and Update. If the program or service did not occur, still report the program or service on the ARER and indicate zero expenditures	The Behavioral Health Fiscal Account Technician has attended DHCS Fiscal Institutes, MHPA Bootcamp and numerous CBHAA meetings and understands the importance of submitting the RER correctly.	
Suggested Improvement Item #2b	MHPA Transparency and Consistency	Suggested Improvement #2b:  DHCS recommends the County provide a budget for each fiscal year in the approved Plan and Update and in each subsequent Plan and Update thereafter	The annual approved county budget encompasses Behavioral Health in its entirety. Staff time drives much of the annual budget creating the largest variable within the annual budget. Transparency occurs through the projected budget and the annual ARER.  The County will provide a budget to be included in the FY 20-23 Plan and FY 20-21 Update by June 30, 2021. It will continue to be provided thereafter within future annual updates and three year plans.	The submitted plan is accepted.
Suggested Improvement Item #3	Individual Services and Supports Plan (ISSPs)	Suggested Improvement #3:	Sierra County Behavioral Health will provide training to all staff involved in the	The submitted plan is accepted

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		<p>DHCS recommends the County provide training to all staff involved in the development and documentation of clients' ISSP and/or Treatment Plan. The County will ensure that all MHA client services delivered will be documented in the Electronic Health Record (EHR) or by hard copy.</p> <p>The EHR for FY 2016-17 lacked MHA progress notes for the randomized selection of FSP clients surveyed</p>	<p>development and documentation of clients' ISSP and/or Treatment Plan.</p> <p>a) Training will occur by December 30, 2020</p> <p>b) Training roster will be submitted by January 31, 2021</p> <p>Sierra County Behavioral Health will create policies and procedures based on the Welfare and Institution codes regarding ISSP development and documentation.</p> <p>a) Policies and procedures will be written by December 30, 2020.</p> <p>b) Written policies and procedures will be submitted to DHCS by January 31, 2021.</p>	
Suggested Improvement Item #4	Contract Oversight	<p>Suggested Improvement #4:</p> <p>DHCS recommends that service provider contracts include the</p>	<p>SCBH will pursue technical assistance from DHCS and MHSOAC to ensure Plans and Annual Updates appropriately indicate performance goals. In conjunction technical assistance will be obtained to be sure Sierra County contracted service provider</p>	The submitted plan is accepted

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		performance goals from the County's approved Plan and Updates that apply to each provider's programs and services per County Performance Contract (6)(A)(5)(d).	contracts include appropriate performance goals.  1. Contact will be made by January 30, 2021 2. Service Provider Contracts will be updated throughout 2021 with appropriate performance goals.	
Suggested Improvement Item #4a	Contract Oversight	Suggested Improvement #4a:  DHCS recommends the County improve tracking of contract deliverables: a) stated deliverables are received by due date, b) review service provider deliverables to confirm scope of work has been performed, c) assess measureable outcomes are consistent with the goals and objectives of the	Sierra County will be contacting MHSOAC for technical assistance to include performance goals within provider contracts.  1) Contact will be made by December 30, 2020. 2) Performance goals will be included in 20-21 contracts.	The submitted plan is accepted

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		programs/services of the currently adopted Plan and Update, and d) review of contract deliverables is documented and evaluated on a regular basis.		