

Fresno County Plan of Correction
Per the County Performance Contract Review Report for Review Dates August 31, 2021

Finding #, Suggested Improvement # or Technical Assistance #	Finding, Suggested Improvement or Technical Assistance	Recommendation # (State Corrective Action Step/Identify Timeline/and Evidence of Corrections/Mechanisms for Monitoring Effectiveness)		Comments/Notes FOR DHCS USE ONLY
FINDING #1:	<p>Fresno County’s Fiscal Year (FY) 2019-20 Annual Revenue and Expenditure Report (ARER) was not posted on the County’s website within thirty days of submission to the Department of Healthcare Services (DHCS). (California Code of Regulations, title 9, section 3510.010(b)(1); Welfare and Institutions Code (W&I Code) section 5899)).</p>	<p>Recommendation #1: The County must post a copy of the FY 2020-21 ARER on the County’s website within 30 days of submitting to DHCS, and each subsequent ARER thereafter</p>	<p>The County concedes this oversight and has completed the correction by having the old RER posted to a page on its website that has been dedicated to MHSA since 2019. The FY 2019-2020 posting can be viewed on-line. In 2019 a specific URL was developed to assist the public in finding Fresno County MHSA related info in an easy manner.</p> <p>The new ARER (2020-2021) will be posted to the www.fresnoMHSA.com withing 30-days of being submitted to DHCS. That URL directs users to the MHSA Page on the County’s website. At this time the ARER is to be submitted to DHCS by January 31, 2022.</p> <p>Additionally, Fresno County has developed a Policy and Procedure Guide (PPG 2.20.21 V#:1) to ensure that the ARER is posted to the County’s MHSA webpage within 30-days. The</p>	<p>The submitted plan is accepted.</p>

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			pending PPG draft is included as support documentation.	
FINDING #2	<p>Fresno County did not update the Three-Year Program and Expenditure Plan (Plan) annually (i.e., the Annual Update (Update)). Specifically, the County submitted the FY 2019-20 Annual Update as part of their FY 2020-23 Three-Year Program and Expenditure Plan (Plan). • The FY is July 1 through June 30. • The FY 2019-20 Update covers the period of July 1, 2019 – June 30, 2020. • The FY 2020-23 Plan covers the period of July 1, 2020 – June 30, 2023. • The FY 2019-20 Update was submitted to DHCS as part of the adopted FY 2020-23 Plan. • The FY</p>	<p>#2 The County must submit an adopted Plan/Update to DHCS no later than June 30 and prior to the FY starting July 1. For example, the adopted FY 2021-22 Update needs to be submitted no later than June 30, 2021, and prior to the FY starting July 1, 2021. The FY 2020-23 Plan needs to be submitted no later than June 30, 2020, and prior to the FY starting July 1, 2020. And each subsequent adopted Plan/Update</p>	<p>Fresno County had initially planned to submit both its MHSA AU and its New MHSA Three Year Plan before June 30, 2020 as two separate documents (one the AU and the other the New Three Year Plan). However, all of its efforts in completion of the plans and subsequent submissions were derailed by the impacts of COVID-19. California Counties were granted an option to seek extensions for submitting their plans. Combination of both COVID-19 limitations and the option for extension by DHCS were both factors for the delay in completion (which was not noted in the finding).</p> <p>Fresno County informed DHCS on April 6, 2020 that it was going to be delayed in its submissions and would be seeking an extension (which DHCS acknowledged in an email on the same date). In that time the County attempted to complete the development of a plan and AU, while attempting to still factor</p>	<p>The submitted plan is accepted.</p>

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	<p>2019-20 Update needs to be adopted by the Board of Supervisors (BOS) no later than June 30, 2019; prior to the FY starting July 1, 2019. • The FY 2019-20 Update needs to be adopted by the BOS no later than June 30, 2019; prior to the FY starting July 1, 2019 and prior to funds being expended for FY 2019-20. The FY 2019-20 Update was adopted by the BOS on April 13, 2021, after the FY 2019-20 ended. (Cal Code of Regs., tit. 9, § 3310(c), 3420(e); W&I Code 5892(g), 5899 (e)).</p>	<p>thereafter needs to be submitted to DHCS no later than June 30 and prior to the FY starting July 1.</p>	<p>for unknown possible challenges due to the pandemic.</p> <p>Fresno County formally submitted the <i>DHCS Form 5510 MHSA Three-Year Program Plan and Expenditures Plan Extension FY 20-21</i> to DHCS on August 4, 2020. A copy is attached. This was a process afforded to counties by DHCS which allowed for delays in submissions. There may be some inconsistency in the State's Finding #2 when it was DHCS who permitted extensions in submissions to be made later due to the COVID-19 Pandemic.</p> <p>Fresno County submitted a combined FY19-20 AU and its 2020-2023 MHSA Three Year Plan as an effort to have those both approved and submitted to reduce additional delays it would have faced in running two separate review process (public posting, community planning and public hearings).</p> <p>Since that time, Fresno County has been able to align its plans and AU with the right calendar. It is in the process of</p>	

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			<p>completing and submitting its AU FY 22-23 by May of 2022 which will be on time.</p> <p>Starting on July 1, 2022, to develop its next MHSa Three Year Plan which it plans to have approved by the Board of Supervisors and to DHCS by May 30, 2023.</p>	
Finding #3	<p>County's adopted FY 2017-20 Plan did not include a description of how stakeholder involvement demonstrates a partnership with constituents and stakeholders throughout the process that includes meaningful stakeholder involvement on: mental health policy, monitoring, quality improvement, evaluation, and budget allocations. (W&I Code section 5848).</p>	<p>#3 The County must include a description of how stakeholder involvement demonstrates a partnership with constituents and stakeholders throughout the process that includes meaningful stakeholder involvement on: mental health policy, program planning and implementation, monitoring,</p>	<p>Fresno County has historically had a very robust community planning process and has had its MHSa Three Year Plans driven by the CPP. The efforts in the MHSa 2017-2020 plan may not have provided a description but the CPP of Fresno is often hailed as an example of true stakeholder engagement.</p> <p>The current MHSa Three Year Plan (2020-2023) already addressed the concerns in Finding #3.</p> <p>In the 2020-2023 plan, there is documentation of the number of public forums (over 20), over 650 surveys, and 20 key informant interviews that included its efforts for true stakeholder engagement. The community sessions are designed to maximize the publics'</p>	<p>The submitted plan is accepted.</p>

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		<p>quality improvement, evaluation, and budget allocations in the adopted FY 2020-23 Plan, FY 2021-22 Update and each subsequent Plan and Update there after.</p>	<p>opportunity to provide input, share insights, and help inform the process. Of the 1.5hr average community forms, the County only allots 20min for its presentation and utilizes the rest of the time for open community input and discussion. Also, at no time did it end any meetings before all attendees had a chance to share and be heard.</p> <p>Pages 15-35 of the 2020-2023 MHSA Three Year Plan describe the entire CPP planning process, including the numerous forums that were done in threshold languages, our geographically isolated communities and for various populations.</p> <p>Pages 22-30 of the current Three Year plan document the themes that emerged from the open community forums, from community surveys and from key informant interviews. Programs and services that have been created as a direct result of stakeholder input in pages 22-30 can be found in the plan (with some new programs).</p> <p>Additionally, Fresno County has been used by the MHSAOAC as an example of</p>	

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		<p>community partnership with stakeholders which yields meaningful involvement.</p> <p>On November 27, 2021 Fresno County was a presenter at the CBHDA's Policy Forum. Fresno County was one of the presenters for Stakeholder Engagement Process for MSHA due to its work in the area of stakeholder engagement (documented in the plan). Fresno was on a panel that included California Pan Ethnic Health Network, NAMI California, The California Behavioral Health Boards and Commissions, and DHCS.</p> <p>Fresno County creates a written Plan for its MSHA Three Year Community Planning Process, which is intended to support its efforts for a robust and meaningful CPP. The formal written plan for the CPP helps ensure the forums are accessible, that the Department seeks input from diverse perspectives and communities, ensures accessible locations/times, and works with local CBOs to help promote the CPP. It establishes a timeline for the various facets of creation of a new Three-Year</p>	

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			<p>Plan, it budgets for its efforts and has proven to be an effective tool for Fresno's CPP.</p> <p>Fresno Plans to develop its next MHSA CPP Plan by June 2022, to help guide and plan its efforts in this area in the coming FY when it works on its new Three-Year plan.</p>	
<p>Finding #4</p>	<p>Fresno County did not include an assessment of the County's capacity to implement mental health programs and services in the adopted FY 2017-20 Plan. (Cal. Code Regs., tit. 9, § 3650(a)(5))</p>	<p>#4 The County must provide an assessment of its capacity to implement mental health programs and services in the next adopted FY 2020-23 Plan, and each subsequent Plan thereafter and include: a. The strengths and limitations of the county and service providers that impact their ability to meet the</p>	<p>The DHCS review focused on the County's 17-20 plan which, while thorough, did have some aspects missing and that is acknowledged by Fresno County. However, the current MHSA Plan 2020-2023 has already addressed the omissions in the previous plans.</p> <p>On pages 35-38 of the current plan (2020-2023), there is a section dedicated to the capacity assessment and under the header of <i>Capacity Assessment</i>. That section is followed by and additional section/header called <i>Workforce Assessment</i> on page38.</p> <p>With regards to 4 (a), these are conducted as part of the County</p>	<p>The submitted plan is accepted.</p>

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		<p>needs of racially and ethnically diverse populations. The evaluation should include an assessment of bilingual proficiency in threshold languages. b. Percentages of diverse cultural, racial/ethnic and linguistic groups represented among direct service providers, as compared to percentage of the total population needing services and the total population being served. c. Identification of possible barriers to implementing the proposed</p>	<p>Network Adequacy as well as its annual Cultural Competency Plan Requirements (CCPR) and related work. It can be included in the plans and will lengthen the current AU and future plans. On page 40 of the current Three Year Plan is a section titled <i>Culturally Specific</i> under the <i>Changes and Opportunities</i> section. The need for culturally and linguistically appropriate services in the County's threshold languages also appear on pages 123, 150 and 217. In addition to those, the plan also reflects specific programming that is created to address needs of specific racial and ethnic diverse populations.</p> <p>4 (b). Will be included in the coming AU and next MHSAs Three Year Plans. Some of the population demographics of persons served can be attained from the County's Annual CCPR. Personnel information will be derived from the Network Adequacy Plans and will increase the number of pages in the plans. DHCS had advised during the review to reduce the length of the plans, however their findings and</p>	

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		<p>programs/services and methods of addressing these barriers.</p>	<p>recommendations will require the plan to be longer in order to ensure Fresno's compliance to the recommendations.</p> <p>4(c) In the current MHSA Three Year Plan there are already eight (8) pages dedicated to item 4(c). It begins on page 38 of the plan under the heading <i>Challenges and Opportunities</i>. In this section the plan addresses both challenges and opportunities as they are related to need for <i>Culturally Specific Services</i>, results of a <i>PEI Evaluation</i>, <i>SB 398</i>, <i>AB 2265</i> <i>SB 1004</i> and <i>Innovation Plans</i>.</p> <p>Thus, with the exception of specifically item 4(b) the current plans already address Finding #4.</p>	
<p>Suggested Improvement #1</p>	<p>DHCS recommends the adopted Plan and Update include written recommendations received during the 30-day public comment period including a summary and analysis of those recommendations and</p>		<p>The review of the 2017-2020 plan did identify some missing requirements, but a review of the 2020-2023 plan will document that these have already been adopted and rectified before the DHCS review of the 2017-2020 plans. The review is providing feedback on a plan that has expired two years ago.</p> <p>In the MHSA Three-Year Plan there are 260 pages of the public's comments and</p>	<p>The submitted plan is accepted.</p>

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	<p>the County's response to them.</p>		<p>summary responses by the department to each one of those. Those are on pages 405-665 of the current Three-Year Plan.</p> <p>This will also appear in the current AU that is slated to be completed by May 2022.</p> <p>Additionally, during the MHSA Three-Year Planning Process in 2019 Fresno County added an additional step to its CPP which it called the <i>Report Back Sessions</i>. These sessions are done after the completion of the CPP/forums, after all the data, themes and information has been analyzed and processed and before the submission of the Plan for 30-Day Public Review. These are done in each of the County's threshold languages. These <i>Report Back Sessions</i> allow the Department to validate the input and explain what and how decisions are being made (what input was received, what are existing services, what may be new programs/services as a result of the input, what may be some limitations and why). This is something that the</p>	

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			Department continues to do with its AU, etc. And they are documented, as is feedback during the 30-day Public Comment in the plans.	
Suggested Improvement #2	DHCS recommends the County includes the County's threshold language in each adopted Plan and Update		In the MHS A Three Year Plan 2020-2023, the threshold languages of the County are documented on page 22 of the current plan. Additionally, promotion and other information materials in the appendix appear in the threshold languages. Thus, this recommendation was already implemented two years prior to the DHCS review. In the AU the languages are addressed and a text box also appears to draw additional attention to the languages.	The submitted plan is accepted.
Suggested Improvement #3	DHCS recommends the County include a description of the training provided to participants in the Community Program Planning Process (CPPP) in each adopted Plan and Update		Fresno County utilizes a standard presentation (a copy of the PowerPoint is included in the submission) that is used for each and every CPP, which provides a brief review of MHS A, each of its components and the CPP/Planning as part of its training. It began to use the submitted PowerPoint in October of 2019. In 2019, Fresno County created several short videos on MHS A and each of the	The submitted plan is accepted.

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		<p>five MHSA components to help train the public. These have been posted to an easy-to-use URL. To find Fresno County MHSA info via www.fresnoMHSA.com . Please use this link above for verification/documentation of training content that was developed in October of 2019. The Fresno County-produced videos have been shared on Department’s social media and YouTube pages. There is a video on MHSA and the components in Spanish (and is being updated with new visuals). A Hmong-language version was developed for the last Three-Year Plan, but the quality was poor and so a new video is being developed. The County plans to have make this video available on the MHSA and Hmong-language pages by late March 2022.</p> <p>The following link (https://youtu.be/GLkoP2dfCuc) is documentation of one of Fresno’s four CPPs for its 2022-23 AU, which also demonstrates Fresno County’s compliance with training on the CPP</p>	

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		<p>process, MHSA, and the Annual Update. Fresno County is providing footage from a virtual CPP that was conducted on 10/19/2021. The MHSA training portion starts at the 20:02 minute mark through 29.20 mark. This is additional documentation of Fresno County's existing practice of training community.</p> <p>DHCS is in receipt of the county's Three-Year plan (2020-2023) as noted in DHCS acknowledgement in Finding #1. DBH is resubmitting to DHCS the link to the plan. Link: 637564055019600000 (fresno.ca.us).</p> <p>The AU 2022-23 is in its 30-day public comment period at this time. The Public Hearing is scheduled for February 2/16/2022. It will take approximately a month to six weeks before the plan can be presented to the BOS for approval, and thus the estimated date for submission to DHCS is late April or May of 2022.</p>	

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Suggested Improvement #4	DHCS recommends the Plan corresponds with the following three year cycle:		<p>In its follow up discussion with DHCS, the County is adjusting its AU to ensure they correspond with the three-year cycles. This was delayed/derailed due to COVID-19.</p> <p>The County will have its AU submitted in time (by May 2022). It will have its AU for 22/23 submitted in time. Also, its MHSA Three Year Plan completed by May 2023.</p>	The submitted plan is accepted.
Suggested Improvement #5	DHCS Recommends the FY 2020-23 Plan and FY 2021-22 Update include budget pages for each fiscal year.		<p>In the coming 2022-23 AU (which was posted for 30-day public comment on January 14, 2022), Fresno County will include the current ARER and Budget information by component in addition to the current individual program costs which are in previous AUs.</p> <p>The plan is only available in draft form at this time. The ARER shall be one of the exhibits in the 2022-23 AU. The county will submit the 2022-23 AU once it has been approved by its BOS. It is anticipated the 2022-23 AU will be submitted in late April or early May 2022 to DHCS.</p> <p>At the time of the initial submission of the Plan of Correction, the DHCS website for submitting the ARER was</p>	The submitted plan is accepted.

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			<p>not working and was causing delays in submitting completed ARERs. However, the ARER was submitted on time on 1/26/2022. Copy of the email submission is being included.</p> <p>The County will include recent ARERs and Budget Information in the next MSHA Three-year Plan (including its projected allocation, current costs, and current available MSHA funding). The new MSHA Three-Year planning process will not start until FY 2022-2023 and thus will not be available for submission until around May of 2023.</p>	
<p>Suggested Improvements #6</p>	<p>DHCS recommends the County must provide an estimate of the number of FSP clients to be served in each age group: children (0-15 years old), transitional age youth (16-25 years old), adult (26-59 years old), and older adult (60 and older) for each fiscal year in the adopted FY 2020-23 Plan, FY 2021-</p>		<p>The current MSHA Plan (2020-2023) already has the projected number of persons to be served by FSPs in each age group. On page 66 of the 2020-2023 plan there is a table with the details for each. This will also continue to appear in the AU and future Three-Year Plans.</p>	<p>The submitted plan is accepted.</p>

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	22 Update and all subsequent Plans and Updates thereafter			