Imperial County MHSA Plan of Correction

County: Imperial	POC Due Date: 06/16/21	Date Received by DHCS:1/5/2022	Completed Date: 06/15/21 Edited Date: 9/30/21
County Contact Person:			
	(The Above Line Will Be Removed Prior To Posting on the DHCS Website)		

Finding # or Suggested Improvement #	Finding or Suggested Improvement	Recommendation # (State Corrective Action Step / Identify Timeline / and Evidence of Corrections / Mechanisms for Monitoring Effectiveness)		
Finding #1	Prudent Reserve Fund investing. Specific investment schedules to compare MHSA, pooled or other funds applicable to June 30, 2012 not provided. Sufficient documentation not provided to support Imperial County is in compliance with investment requirement.	1. The County should develop schedules to support MHSA and other County funds are invested consistently. 2. Imperial County Behavioral Health should develop the MHSA funds investment policy in order to be in	1. Imperial County Behavioral Health (ICBHS), in collaboration and assistance of Imperial County Auditor-Controller's, on June 10 th 2021 a new Trust Account was created to place potential for reversion funds and any interest incur for those funds. ICBHS will adhere to Imperial County Treasurer-Tax Collectors Investment Policy and Procedure. 2. ICBHS is working closely with our department's MHSA Coordinator in the	Completed
	(W&I Code, Section 5892(f) requires prudent reserve funds invested consistently as other County funds.	compliance with the regulation that MHSA funds need to be invested. 3. Adjust investment income as needed to agree with schedules that document interest	development of an MHSA Funds Investment Policy in order to be in compliance with MHSA Regulations. Estimated time of completion August 31, 2021.	Completed
		income earned at the pooled investment fund rate that is consistent with other County funds; for this year and all to other affected fiscal years	3. ICBHS determined that Fund 1748 – Community Services and Supports Component was initially set-up as a non-interest bearing account but after review of CCR Title 9 and W&I Code 5892(f) Fund 1748 became an interest earning account in FY 2013-2014.	Completed

Enclosure 2

Finding #2	Imperial County is not in compliance with W&I Code Section 5892(f) Local Mental Health Services Fund Requirements	 Imperial County Behavioral Health should develop the MHSA funds investment policy in order to be in compliance with the regulations that MHSA funds need to be invested consistently with other county funds. ICBHS is working closely with our department's MHSA Coordinator in the development of an MHSA Funds Investment Policy in order to be in compliance with MHSA Regulations. Estimated time of completion August 31, 2021. 	Completed
		 Develop interest allocation schedules supporting method and source. ICBHS will adhere to Imperial County Annual Investment Policy for the Pooled Investment Funds approved by the Imperia County Board of Supervisor on August 18, 2020. 	Completed
Finding #3	Imperial County is not fully documented for compliance with Non-Supplant requirement.	Develop a non-supplant written policy. Develop a non-supplant written policy. Develop a non-supplant written development of a Non-Supplant policy for MHSA Funds in order to be in compliance with MHSA Regulations. Estimated time of completion August 31, 2021.	Completed
		 2. Develop schedules showing each fiscal year expansion usage of MHSA funds. 2. ICBHS has develop reports reflecting funding being used according to DMH Letter 05-08 Enclosure 1, DMH 05-04 guidelines and the county's approved MHSA Three-Year Expenditure Plan and/or Plan Update. 	Completed