

Trinity County Plan of Correction
Per the County Performance Contract Review Report for Review Date September 2, 2020

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	Trinity County submitted the FY 2018-19 Annual Revenue and Expenditure Report (ARER) past the due date. (California Code of Regulations, title 9, section 3510(b)).	Recommendation #1: The County must submit the FY 2019-20 ARER no later than January 31, following the end of the fiscal year.	Trinity County submitted its FY 2018-19 ARER on 2/10/2020, with the certification being signed on 1/30/2020. Trinity County was training new fiscal staff on the Mental Health Cost Report as well as the ARER and training processes took longer than anticipated. Trinity County will submit future ARER documents by the deadline.	The submitted plan is accepted.
Finding #2	Trinity County's adopted FY 2017-20 Three-Year Program and Expenditure Plan (Plan) and FY 2018-19 Annual Update (Update) did not include expenditure plans. (Welfare and Institution (W&I) Code, § 5847(e)).	Recommendation #2: The County must provide an expenditure plan for each fiscal year in the approved Plan and Update and in each subsequent Plan and Update thereafter.	The Trinity County Mental Health Services Act Coordinator resigned prior to the 2017-2018 Three-Year Program and Expenditure Plan and the FY 2018-19 Annual Updates being due. Staff completing these documents were not aware of the requirement to submit an Expenditure Plan with the documents. Trinity County has since hired a new MHSA Coordinator and all future plans and updates will have the Expenditure Plans included.	The submitted plan is accepted.
Finding #3	Trinity County's adopted FY 2017-20 Plan and FY 2018-19 Annual Update (Update) did not include reports on achievement of performance outcomes for MHSA	Recommendation #3: The County must develop and implement policies and procedures to ensure data is collected and analyzed to report on its achievement of performance outcomes	The Trinity County Mental Health Services Act Coordinator resigned prior to the 2017-2018 Three-Year Program and Expenditure Plan and the FY 2018-19 Annual Updates being due. Staff completing these documents were not aware of the requirements on performance Outcomes in the Three-Year Plan or Annual Updates.	The submitted plan is accepted.

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	<p>services. (W&I Code, § 5848(c); County Performance Contract (6)(A)(5)(d)).</p>	<p>for services provided. The adopted FY 2020-23 Plan and FY 2019-20 Update, shall include reports of achievement of performance outcomes for MHSA services provided; and for each subsequent Plan and Update thereafter.</p>	<p>Trinity County has since hired a new MHSA Coordinator and all future plans and updates will have performance outcomes as required.</p> <p>Staff are currently working on creating a policy surrounding 3-year plans, annual updates and ARER submission requirements.</p> <p>***The COVID19 Pandemic is still influencing workload. TCBHS anticipates having all Policy Updates complete and submitted to DHCS by 12/31/2021.</p> <p>***Trinity County will include reports and data on achievement of performance outcomes in the 2020—2023 3- year plan and all subsequent plans and updates thereafter. We will be utilizing reports sent by contracted providers, dashboards from our EHR and data collected from the DCR as it is available.</p> <p>11/18/21 - Trinity County BHS took their 2020-2023 3-Year Plan to the Mental Health Advisory Board on 11/17/21. Public Comment opened on 11/18/21 and will close 12/17/21. The 3-Year Plan will go to the Trinity County Board of Supervisors on December 21,2021. The County will have their 3-Year Plan with the requested</p>	

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			information to DHCS and the MHSOAC by January 31, 2022.	
Finding #4	Trinity 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.	<p>Trinity County has an MHSA Issue Resolution Log and does record grievances and outcomes. The FY 18/19 log has 2 complaints logged, as well as the outcomes. Trinity County will continue to log all MHSA grievances and outcomes. There were no grievances filed in FY 19/20 and none to date in FY 20/21.</p> <p>Policy and log from 18/19 attached to email for reference.</p> <p>***Consumer did not want to file a formal grievance regarding complaint received on 4/25/18, therefore there was no final resolution. Attached are handwritten notes on informal grievance log. Final resolution for the complaint received on 1/8/19 was written on 1/30/2019 and mailed to consumer on 1/31/2019. (Letter attached for reference)</p> <p>***Trinity County has updated the grievance log to include the date of final resolution as suggested. The log is being sent with this POC update</p>	The submitted plan is accepted.

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Finding #5	Trinity County did not submit the approved FY 2018-19 Update to the Department of Health Care Services (DHCS) within 30 days of adoption. (W&I Code, § 5847(a)).	Recommendation #5: The County must submit the approved FY 2020-23 Plan and FY 2019-20 Update to DHCS at MHSAs@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.	The Trinity County Mental Health Services Act Coordinator resigned prior to the Fiscal Year 2018-19 update being due. Staff completing the document did not have proper training due to the sudden resignation of the MHSAs Coordinator, and were not aware submission requirements. Trinity County has since hired a new MHSAs Coordinator and all future plans and updates will be submitted within 30 days of adoption as required.	The submitted plan is accepted.
Finding #6	Trinity County did not provide an estimate of the number of clients, in each age group, to be served in the Full Service Partnership Service (FSP) Category for each fiscal year in the approved FY 2017-20 Plan. (Cal. Code of Regs., tit. 9, § 3650(a)(3)).	Recommendation #6: The County must provide an estimate of the number of FSP clients 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 in the approved FY 2020-23 Plan and each	The Trinity County Mental Health Services Act Coordinator resigned prior to the 2017-2018 Three-Year Program and Expenditure Plan being due. Staff completing the document did not have proper training due to the sudden resignation of the MHSAs Coordinator, and were not aware of the submission requirements. Trinity County's target for FSP clients currently, are as follows: Children: 2 TAY: 2	The submitted plan is accepted.

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		subsequent Plan thereafter.	<p>Adult: 15 Older Adult: 5</p> <p>Fiscal Year 18/19 Trinity had a total of 18 unduplicated FSP clients. Fiscal Year 19/20 Trinity had a total of 21 unduplicated FSP client. Client Roster report (with names redacted) attached for reference.</p> <p>***The first year of any three-year plan, beginning with 2020-2021, will include an estimate of the number of clients, in each age group, to be serviced in the Full-Service Partnership Service (FSP) Category, and each subsequent plan/update thereafter will be updated accordingly.</p> <p>***Trinity County will develop a MHSA Policy and Procedure surrounding FSP data collection and reporting process by fiscal year, by age group and include the data in the 20-23 Plan, and all subsequent plans and updates thereafter. The County will use it's EHR and dashboards provided by our EHR Vendor. Trinity County anticipates being able to provide a FSP Policy and Procedure document to DHCS by March 31st, 2022.</p>	

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Suggested Improvement Item #1	MHSA Transparency and Consistency	Suggested Improvement #1: DHCS recommends the ARER be consistent with the budget in the approved Plans and Updates. If the program or service did not occur, report the program or service on the ARER and indicate zero expenditures. Provide an update of that program or service in the following approved Plan or Update.	<p>The Trinity County MHSA Coordinator will work closely with Trinity County Fiscal staff to ensure the Program names, budget amounts and expenditures are reflected accurately. If any services or programs do not incur in any given year, the Program name will be listed, showing zero expenditures. Plan updates will provide information on all Programs.</p> <p>*** Beginning with Fiscal Year 2020-2023 Three-Year Plan, the ARER will be consistent with Three-year Plans and Expenditure reports and all subsequent plans/updates thereafter.</p> <p>11/18/21 - Trinity County BHS took their 2020-2023 3-Year Plan to the Mental Health Advisory Board on 11/17/21. Public Comment opened on 11/18/21 and will close 12/17/21. The 3-Year Plan will go to the Trinity County Board of Supervisors on December 21, 2021. The County will have their 3-Year Plan with the requested information to DHCS and the MHSOAC by January 31, 2022.</p>	The submitted plan is accepted.
Suggested Improvement Item #1a.	MHSA Transparency and Consistency	Suggested Improvement #1a: DHCS recommends the County post the full ARER on the County's website.	<p>Trinity County has posted the ARER to their website. We were made aware of an error in a previous link and have since corrected the issue.</p> <p>https://www.trinitycounty.org/sites/default/files/Behavioral%20Health/Trinity%20FY2018-</p>	The submitted plan is accepted.

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			19%20MHTSA%20Rev%20and%20Exp%20Report%20-%20Revised%2002-14-19.pdf	
Suggested Improvement Item #2	MHTSA Policies and Procedures	Suggested Improvement #2: DHCS recommends the County should update policy and procedure MHTSA – Community Program Planning Process (CPPP) to include that the plans and updates should be submitted to OAC and DHCS within 30 days of the County Board of Supervisors' adoption.	The Trinity County Mental Health Services Act coordinator is working with the Trinity County Compliance Officer to review and update all County Policies related to MHTSA and its programs. The CPPP policy will be updated to include the requirement that Three-Year Plans and Updates are submitted to both the OAC and DHCS within 30 days of approval by the County Board of Supervisors. ***The COVID19 Pandemic is still influencing workload. TCBHS anticipates having all Policy Updates complete and submitted to DHCS by 12/31/2021.	The submitted plan is accepted.
Suggested Improvement Item #2a	MHTSA Policies and Procedures	Suggested Improvement #2a: DHCS recommends the County incorporate all aspects of the current CPPP into formalized written policies and procedures. This includes CPPP designated positions, staff training,	The Trinity County Mental Health Services Act coordinator is working with the Trinity County Compliance Officer to review and update all County Policies related to MHTSA and its programs. ***The COVID19 Pandemic is still influencing workload. TCBHS anticipates having all Policy Updates complete and submitted to DHCS by 12/31/2021.	The submitted plan is accepted.

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		stakeholder training, client and stakeholder outreach and involvement.	***The County will update it's CPPP policy to include all aspects of the CPPP. The County respectfully requests a time extension on this to March 31, 2022.	