California Coalition for Behavioral Health

December 2, 2025

Kim Johnson, Secretary
California Health and Human Services Agency
1215 O Street
Sacramento, CA 95814

Michelle Baass, Director
California Department of Health Care Services
P.O. Box 997413, MS 0000
Sacramento, CA 95899-7413

Dear Secretary Johnson and Director Baass,

Understanding the performance of behavioral health services is essential to making progress toward improving behavioral wellness for all Californians. We appreciate the opportunity for public comment regarding the proposed Behavioral Health Transformation performance measures, and urge the State to incorporate the following recommendations.

1. **Access is not enough:** In regard to the categories of race, ethnicity, culture, age, LGBTQ+, homelessness and justice-involvement, it is not enough to measure access alone. It is important to collect, parse and communicate data in regard to both access measures, *and* performance outcome measures (life outcomes) for all of these categories. The State and local communities need to know if the services are equitable and working.

2. **Performance Measure-Specific Comments** (Comments on the two performance outcome measures in your draft plan)
    - **HO-2:** The Permanent Housing Performance Outcome Measure measures only if an individual attained housing within a 12 month period. This is very incomplete information. It is important to maintain and extend currently reported data, including:
        - Reduction of days of homelessness for those served by county behavioral health agencies (in a 12-month period)

        - % of individuals served by county behavioral health agencies who have remained stably housed (12+ months) (Some individuals continue for multiple years in Full Service Partnerships)
    - **JI-1:** The Recidivism Among Justice-Involved Persons measures only for experience of one episode of recidivism within 12 months of arrest and/or release. Again, it is important to maintain and extend currently reported data.
        - Data should indicate how many arrests and/or incarcerations occurred for justice-involved individuals during 12+ month period(s).
        - Many individuals spend months pending adjudication, so 12 months is too limited.
        - California Bureau of State and Community Corrections (BSCC), defines adult recidivism as: "…the conviction of a new felony or misdemeanor committed within three years of release from custody or committed within three years of placement on supervision for a previous criminal conviction. The term "committed" refers to the date of the offense, not the date of the conviction." (https://www.bscc.ca.gov/wp-content/uploads/2024/07/Recidivism-Guidelines-Updated-July-2024.pdf).
    - **Currently Reported**: Most county behavioral health agencies are currently providing performance outcome data related to reductions in homelessness, hospitalization and incarceration for individuals in full service partnerships. It is important to maintain and extend currently reported data. County behavioral health agencies should also track (or continue to track) reductions or increases in:
        - Emergency Room Visits
        - Crisis Stabilization Services (number of episodes)
        - Hospitalizations/Re-hospitalizations (number of days; number of episodes)
        - 5150's (it is important especially to monitor repeat 5150's)

3. **Communication of Data:** The public should be provided performance information with context including:
    - Understanding of different systems, including the responsibilities of each within the performance information:
        - County Behavioral Health Agencies
        - Managed Care Plans
            - Plan-Specific Information
        - Private Coverage
    - Removal of children from their homes, with communication of situations when removal should be accomplished
    - Complexities of causes of homelessness and justice-involvement
    - Federal Activities that impact the performance during the next few years**:**
        - Hospital closures (due to changes in the HMO tax)

        - Sanctions for providing services to individuals eligible for services**:** There is concern that the federal government may remove federal funding from organizations that provide services to undocumented residents, *even if* services are not funded with federal dollars.

4. **New & Adapted Measures:** Attention to new measures and those that are being adapted should include:
    - **Delineation** of:
        - Behavioral Health Needs
        - Significant Behavioral Health Needs
    - **Adjustments -** Future opportunity for reconsideration of new and adapted measures should be provided.
    - **Casting** - Because we do not know if we are casting too wide, or not wide enough, future reconsideration should be provided.

5. **Timeliness of Data:** Reported data needs to be publicly provided for analysis in a timely fashion in order to be relevant in planning processes.

Sincerely,

Theresa Comstock, President
CA Coalition for Behavioral Health (CCBH)
ccbh@cabehavioralhealth.org

cc: Stephanie Welch, CHHS
Paula Wilhelm, DHCS
Marlies Perez, DHCS
Dr. Anna Naify, DHCS
Jenny Bayardo, CA Behavioral Health Planning Council (CBHPC)
Noel O'Neill, CBHPC Performance Outcomes Committee
Brenda Grealish, Commission for Behavioral Health (CBH)
Melissa Martin-Mollard, CBH