



California Association of Local Behavioral Health Boards and Commissions

December 2, 2025

Dr. Anna Naify and BHT Quality and Equity Workstream Staff
California Department of Health Care Services
Via Email

Dear Dr. Naify and BHT Quality and Equity Workstream Staff,

On behalf of California's 59 local behavioral health boards and commissions, CALBHB/C appreciates the opportunity for public comment regarding the proposed [Behavioral Health Transformation performance measures](#). California law (WIC 5604.2) requires these 59 boards/commissions to review and comment (locally¹ and to the State²) on the needs and performance (including performance outcomes) of behavioral health services. This information, along with timely review and analysis, is essential to making progress toward improving behavioral wellness in local communities throughout California. We therefore urge DHCS to incorporate the following recommendations.

1. Access & Performance Reporting:

- 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.
- It is important to provide easy access (to the public) to county-specific access and performance outcome information along with statewide average information.

2. Performance Outcome Measures (Comments on the two performance outcome measures in your draft plan)

¹ WIC 5604.2 Duty #5: "Submit an annual report to the governing body on the needs and performance of the county's behavioral health system."

² WIC 5604.2 Duty #7: "Review and comment on the county's performance outcome data and communicate its findings to the California Behavioral Health Planning Council."

- **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)
- **JJ-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." [Link to Guidelines](#).
- **Currently Reported:** Most county behavioral health agencies are currently providing performance outcome data related to reductions (or increases) in homelessness, hospitalization(s)/re-hospitalizations, 5150's 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. **Timeliness of Data:** Reported data needs to be publicly provided for analysis in a timely fashion in order to be relevant for local review, comment and planning processes.

Sincerely,

Theresa Comstock, Executive Director