



**SANTA CRUZ COUNTY**  
Civil Grand Jury

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## **County Behavioral Health Services – A State of Mind**

### **Focus. Fund. Save.**

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### **Summary**

The Grand Jury's investigation of the Behavioral Health Division (BHD) showed poor or non-existent metrics on BHD programs and services displayed on County web portals. Serious gaps in addressing South County health care needs were also found. This report highlights the above facts and provides the recommendations to address them.

Recommendations include:

- **Transparency Overhaul:** Improve reporting of program outcomes and costs to enable program evaluation and enhance public transparency.
- **Enhanced Case Management:** Increase emphasis on enhanced case management services which will reduce long term health care costs.
- **Local Care Focus:** Reduce costly out-of-county inpatient transfers by investing in local resources.
- **South County Investment:** Address socioeconomic disparities in South County to improve overall health outcomes.

The Grand Jury believes that these approaches will improve outcomes for residents through increased and better targeted mental health services. Improving behavioral health services will create a healthier and more vibrant South County.

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## Background

The Grand Jury is charged with investigating the budget of one or more of the Santa Cruz County departments. The Grand Jury decided to investigate the budget of the Health Services Agency (HSA). Within that organization, the Behavioral Health Division which provides services to address mental health, substance use disorders as well as other public health programs, has the largest single budget. Therefore, HSA's Behavioral Health Division became the focus of the Grand Jury's investigation.

Santa Cruz County Behavioral Health Division struggles to meet the mental health needs of our community. It has neither the fiscal means nor staff resources to adequately do so.

The 2022-2023 Grand Jury report, *Diagnosing the Crisis in Behavioral Health*, stated: "Santa Cruz has more homeless people per capita than anywhere else in California." At the time of the 2022-2023 report publication:

*Some 2,300 of our residents were without housing. An estimated 37% of the Behavioral Health Services clients were homeless. About 67% of homeless residents were experiencing chronic substance abuse, and 43% of Behavioral Health Services substance use disorder clients were involved with the criminal justice system.*<sup>[1][2]</sup>

The Behavioral Health External Quality Review (EQR) revealed that Santa Cruz County has three times the number of behavioral health high-cost beneficiaries (HCB) when compared to the state average for calendar years 2018 through 2020. HCBs are identified as those with approved claims of more than \$30,000 in a year.<sup>[3]</sup>

In addition to this challenge, there are fiscal barriers to providing the various types of services and the volume of services our community needs. The fiscal year 2023-2024 budgeted expenses for BHD are 54.9% of the HSA total expense budget of \$259 million. To put this figure in perspective, only 22% of this same HSA budget is allocated for medical clinical services by County health clinics.<sup>[4]</sup> Even with the size of the BHD budget, the need outstrips fiscal resources.

According to the Grand Jury report from 2022-2023, *Diagnosing the Crisis in Mental Health*, the staff vacancy rate in the Behavioral Health Division was 30%.<sup>[5]</sup> The report stated that the hard-to-fill positions within BHD included psychiatrists, psychiatric nurses, licensed mental health practitioners, and other direct service practitioners—especially bilingual staff.<sup>[6][7]</sup> This year's interviewees indicated that challenges in filling vacancies continue to exist.

All of the above statistics point to a disturbing reality: Santa Cruz County's Behavioral Health Services, relative to other California counties, is charged with providing mental health services to a substantial, high-need population that the County does not have the resources to adequately address.

## **Scope and Methodology**

The objective of this investigation is to determine which of the many County behavioral health programs are the most effective. The approach is to examine treatment results and the costs associated with each program. Specific topics the Grand Jury investigated include:

### ***Performance Measurement***

- Identifying funding sources of the BHD programs.
- Identifying the number of patients being treated, programs serving these patients, and the volume of service provided.
- Evaluating data that can be used to determine the value of specific programs.
- Identifying the number of high-cost beneficiaries and the percentage of the HSA resources consumed treating these patients.
- Analyzing quantitative data of patients transferred out of the county for treatment and their associated costs.
- Ensuring that interested residents can find all the above information easily from County websites.

### ***Programs***

- Determining the number of programs in place that are “preventative” in nature and the percentage of the HSA budget being allocated to these programs.
- Analyzing the correlation of socioeconomic indicators on healthcare outcomes.

### ***Patient Profiles***

- Determining if high-cost beneficiaries are being tracked and provided case management services.

The sources of information gathered for this report include:

- Interviews with HSA staff as well as outside public health experts.
- Program data collected and reported by Santa Cruz County BHD.
- Program data collected and reported by other government entities, both state and federal.
- Budget data for Santa Cruz County and other government entities, including data posted on the California Health and Human Services (CalHHS) website.
- Review of relevant articles, published reports, newspaper articles, and documents found online regarding mental health.
- Attendance at monthly Mental Health Advisory Board meetings.

## Investigation

The Grand Jury conducted an in-depth investigation of mental health issues in our county. This investigation discusses in detail core issues that the Jury has identified as needing to be addressed in order to meet our community's growing mental health needs. The Grand Jury believes that if the mental health program issues can be effectively addressed, then the social issues raised by this Grand Jury report and other Grand Jury reports can also be alleviated.

### ***Lack of Data Transparency and Program Effectiveness***

Currently, data as presented to the public does not help to allocate the agency's resources to the most effective program and to populations with the highest need for mental health services. The following are specific areas where there is a lack of data transparency:

- **County of Santa Cruz Finance Data:** Santa Cruz County's website has made tremendous strides in improving financial transparency through the OpenGov Website which allows the public to view County budgets.<sup>[8]</sup> However, it does not provide the functionality that would allow users to filter down to financial information by individual programs and therefore is not usable for that purpose by the general public.<sup>[9]</sup>

There are no instructions targeted to the layperson on how to use the website or interpret the financial data. As an example, it is hard to find the exact funding amount the County receives from the Mental Health Services Act, (MHSA) Prop 63.<sup>[10]</sup> It is not clear where the MHSA funding is embedded among the various State Funding sources the County receives.<sup>[11]</sup>

The 2017-2018 Grand Jury report *Data-Driven Budgeting – New Ways To Get Better Results* stated, "A budget document is more meaningful to the general public when it correlates spending priorities to the public value of services. The County's comparative interactive budget tool, while publicly accessible, does not include performance measures or provide a broader performance data dashboard tool that County departments can leverage." Budgeting based on performance data is known as "performance budgeting."<sup>[12]</sup>

- **Diverse Sources:** Funding sources include Medi-Cal, California Mental Health Services Act funds, and County General Fund contributions. Budget and individual program analyses are challenging due to the mix of funding streams.<sup>[9]</sup>
- **Services Provided by External Providers:** Independent health providers such as hospitals and urgent care medical facilities provide services to patients also being served by the County. Data collected by these external providers is not necessarily available to the County BHD. Missing data can skew the calculation of performance metrics.<sup>[13]</sup>
- **High-Cost Beneficiaries Root Cause Analysis:** None of the officials interviewed could provide a satisfactory answer regarding why Santa Cruz

County ranks so high among California counties in the number of high-cost beneficiary patients. No data was available to the Grand Jury for high-cost beneficiaries by zip code.<sup>[14][15]</sup> The BHD does not have enough staff to do a root cause analysis.<sup>[6][7]</sup>

**County and State Reporting:** The HSA data collection required to comply with mandated county and state requirements does not measure the outcome. As an example, the data collected may be by the number of people served by a program. This does not include the number of rehospitalizations or improvements in industry-accepted scores like the Adult Needs and Strengths Assessment (ANSA).<sup>[16]</sup>

**Metrics Gap:** Public access to County contract provider program metrics is limited. Key programs like the Janus Withdrawal Program<sup>[17]</sup> and County Volunteer Center's services<sup>[18]</sup> lack publicly available performance measurements. This makes evaluation of contract-provided program services challenging.

### ***Out-of-County Transfers***

The Grand Jury was motivated to look into out-of-county (OOC) transfers based on interviewees indicating that this was an example of where costs could potentially be saved.<sup>[19]</sup> The Grand Jury was interested in knowing how many such transfers occur and the cost of such transfers.

Patients are transferred to OOC hospitals when Santa Cruz County is at capacity and has no beds for its patients or does not have available treatment services. Figure 1 below shows the number of times Santa Cruz County patients were transferred to OOC hospitals for inpatient, emergency, or ambulatory surgery treatment. This data from California Health and Human Services (CalHHS) shows the distribution of patient transfers sorted by zip codes over the past three years.

Figure 1 below shows that the zip code of 95076 had the highest number of patient transfers outside the county for the previous 3 years. This indicates that almost 40% of all the transfers occur from one zip code - 95076. For context, Figure 2 below shows the zip codes within Santa Cruz County.

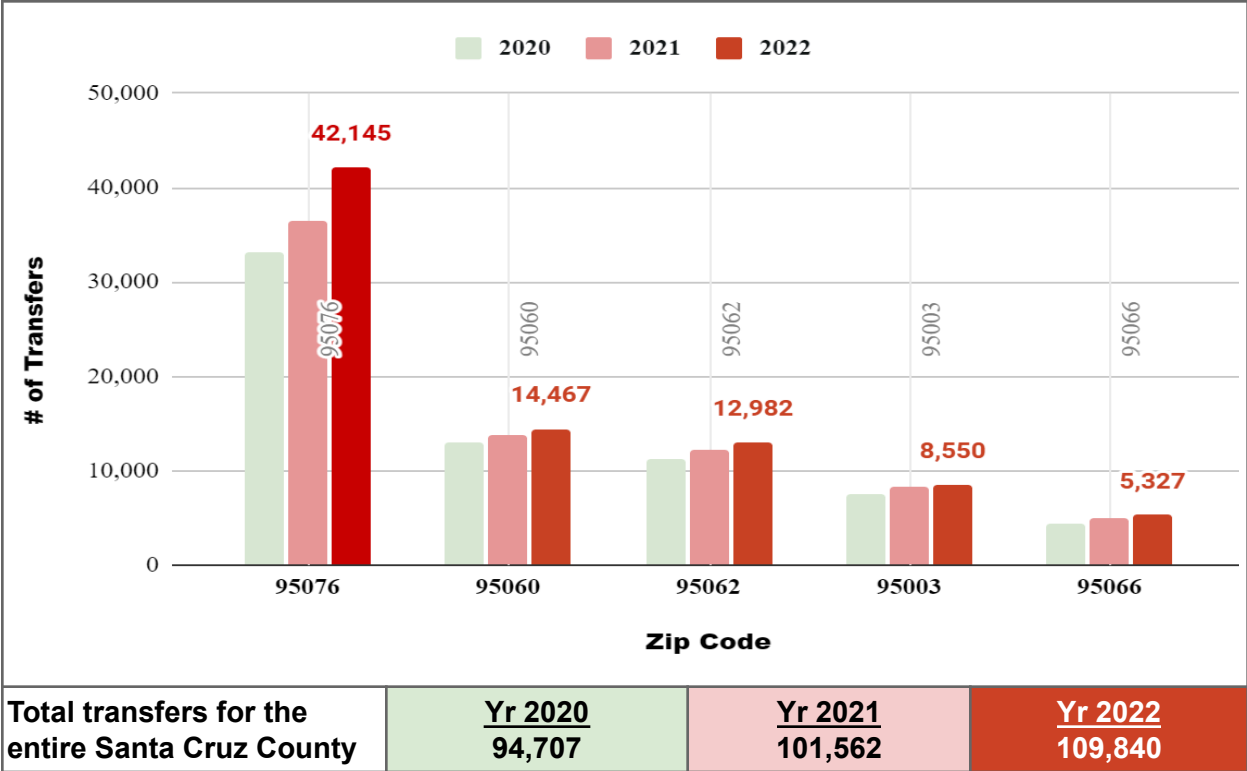


Figure 1: Patient Discharges to Hospitals Outside of the County (Top five zip codes).<sup>[20]</sup>

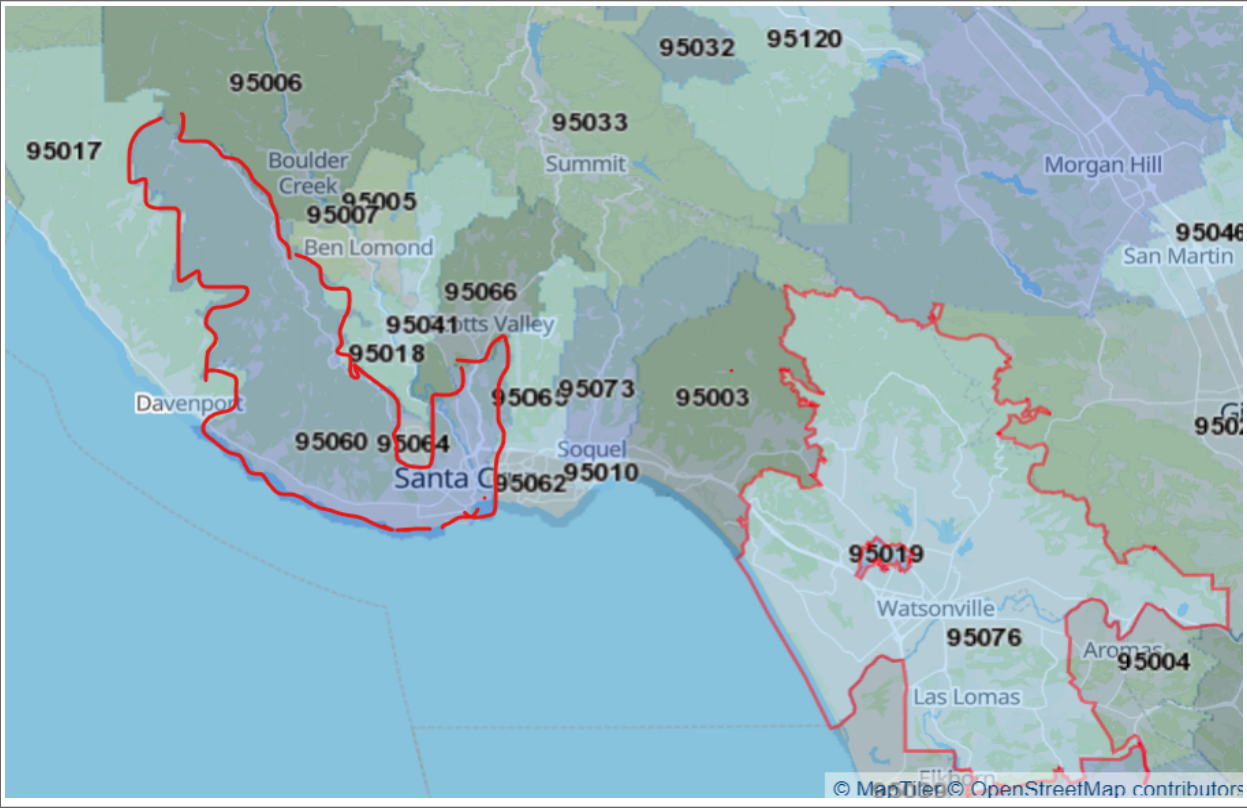


Figure 2: Zip codes within Santa Cruz County, showing cities.<sup>[21]</sup>

## How Much Do These Transfers cost?

The County pays 100% of the cost for the care when Santa Cruz County HSA patients are transferred to an out-of-county inpatient facility. The County does not receive the Federal match for any Medi-Cal out-of-county inpatient care. This is in contrast to health care services provided within the county where the Federal funds match 50% of the Medi-Cal expenses.<sup>[22]</sup>

Figure 3 below shows the cost of out-of-county transfers or “Outside Hospital Expenses” in the County HSA Budget for years 2020-2022.

Data				
	2020-21 Actual	2021-22 Actual	2022-23 Adopted Budget	2022-23 Estimated Actuals
Outside Hospital Expense	\$ 16,568,173	\$ 20,759,402	\$ 17,679,129	\$ 18,846,400
Outside Expense Medical Care	3,985,277	3,495,324	4,294,350	4,294,350
Outside Physicians	255,881	255,561	400,000	400,000
<b>Total</b>	<b>\$ 20,809,332</b>	<b>\$ 24,510,287</b>	<b>\$ 22,373,479</b>	<b>\$ 23,540,750</b>

**Figure 3:** Derived from Santa Cruz County FY 2023-24 Financial Summary<sup>[23]</sup>

The high number of out-of-county transfers takes away funding from healthcare services like mental health and addiction treatment. The relative lack of inpatient health care services especially impacts the residents of 95076, as shown by these statistics. Increased inpatient facilities would reduce out-of-county transfers and associated costs to the county.

The passing of Measure N,<sup>[24]</sup> a \$116M bond initiative for Watsonville Community Hospital, may allow for better healthcare facilities in the 95076 zip code in the coming years. It may not stem the flow of patients needing emergency services in the short term.

## Prevention and Social Determinants of Health

Continuing to build more facilities and providing more healthcare is a stopgap solution.

Recent action has been taken by the BoS and the County HSD to improve the situation in the form of a \$500,000 CORE Funding allocation for South County Prevention Services. The County has opened a South Government Services Center, in part for the delivery of these critical services for South County residents.<sup>[25] [26] [27]</sup>

Prevention is the only way to reduce long term health care costs.<sup>[28]</sup> Health care activities must include not only treatment of existing health conditions, but also promote health and prevention services that create healthier communities.

The Grand Jury decided to look at social determinants of health (SDOH) as advocated for by the Centers for Disease Control and Prevention (CDC).<sup>[29]</sup> SDOH are the conditions in the environments where people are born, live, learn, work, play, worship,

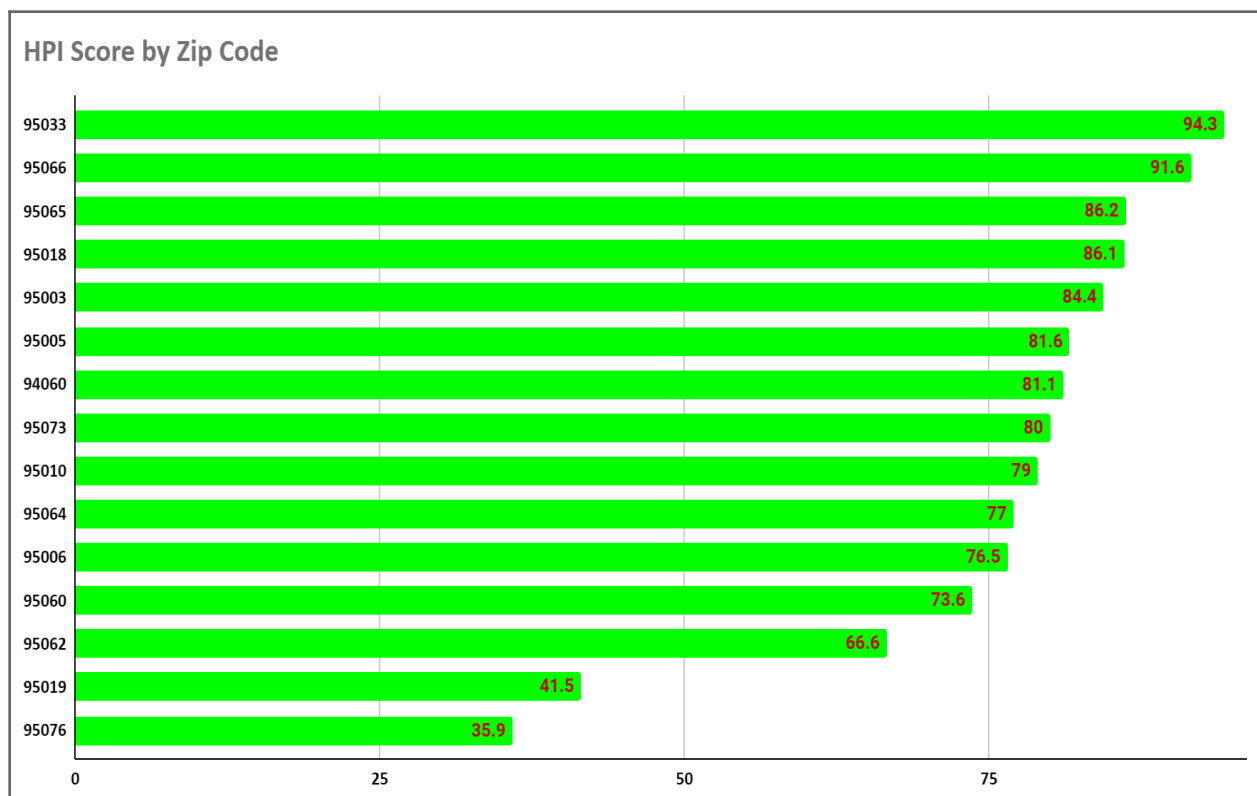


and age that affect a wide range of health, functioning, and quality-of-life outcomes and risks.<sup>[30]</sup> The SDOH is a more accurate indicator of health outcomes than either genetic factors or access to healthcare services.<sup>[31] [32] [33] [34]</sup> This means that things like a person's income level, education, and neighborhood environment have a larger impact on their health than the medical treatment they receive.

To look into the possible drivers of these indicators, the Grand Jury looked at Healthy Places Index® (HPI) data and Mental Health Index (MHI) data across zip codes of Santa Cruz County.

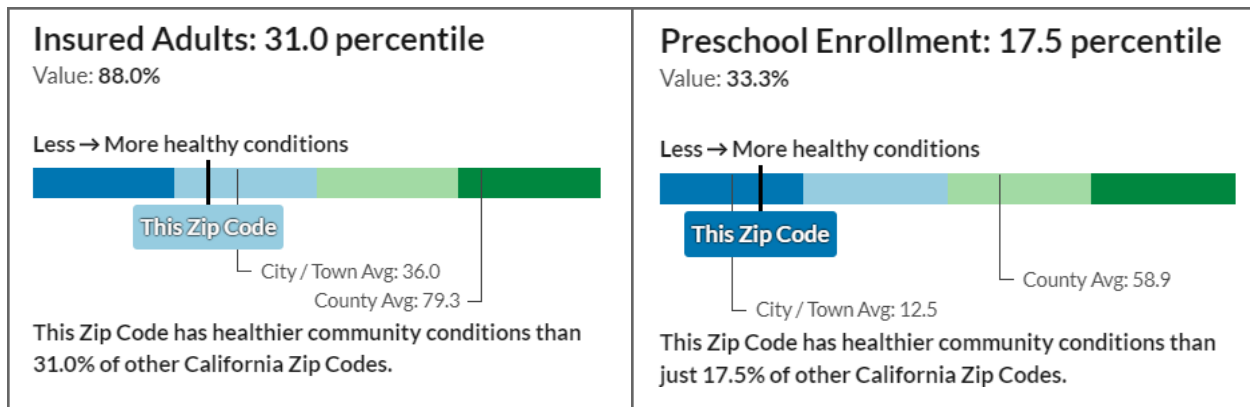
### Healthy Places Index®

A project of the Public Health Alliance of Southern California, the Healthy Places Index® (HPI), is a powerful data and policy platform created to advance health equity through open and accessible data.<sup>[35]</sup> This index maps data on social conditions that drive health such as education, job opportunities, healthcare access, and clean air and water. Higher numbers are indicative of better healthy community conditions compared to the rest of the California zip codes.



**Figure 4:** A comparison of HPI Scores for all zip codes in Santa Cruz County.<sup>[36]</sup>

Figure 4 above shows that the South County zip codes 95019 and 95076 have the lowest HPI scores within Santa Cruz county. These South County zip codes lag far behind the rest of the County zip codes on socioeconomic indicators for healthy living. This contributes to increased South County healthcare costs.



**Figure 5:** Examples of two socioeconomic indicators in zip code 95076<sup>[37]</sup>

Figure 5 above shows that even though 88% of adults residing in 95076 are insured, its percentile ranking is only 31% compared to other California zip codes. This indicates the effectiveness of being “insured.” Being insured by itself does not guarantee better health outcomes if the health services are poor or not available in the area. This is the case for 95076.<sup>[38] [39]</sup> The same is true for Preschool Enrollment indicating a very low enrollment compared to other zip codes.

California Proposition 1 (2024) is intended to address the socioeconomic indicators related to homelessness. This funding may eventually alleviate the housing, overcrowding and affordability issues in the 95076 zip code, reducing the incidence of mental health cases, hence improving general health outcomes.<sup>[40]</sup>

### **Mental Health Index**

The Mental Health Index developed by Conduent Healthy Communities Institute and part of the SocioNeeds Index® Suite, is a measure of the SDOH correlated with self-reported poor mental health. It identifies areas of high need within the community, requiring targeted interventions.<sup>[41]</sup> The MHI for the zip code 95076 has a rank of 5 indicating “High Need” with respect to socioeconomic indicators Homelessness, Unemployment, Healthcare Access, and Single Parent Household.<sup>[42] [43]</sup>

In summary, both HPI Index and Mental Health Index of 95076 reveal poor socioeconomic conditions compared to the rest of Santa Cruz County, calling for urgent attention to address these issues and reduce health care costs.

### **Case Management Programs**

Case Management programs provide comprehensive care to patients with complex needs. Santa Cruz County implements this type of program as Santa Cruz Enhanced Care Management.<sup>[44]</sup>

### **Santa Cruz County Care Management Background**

Santa Cruz County participated in a California pilot program called the Whole Person Care program, which started in 2016 and ended in 2021. It was a grant-funded program to provide case management services to Medi-Cal patients that met multiple needs

criteria.<sup>[45]</sup> There is evidence that case management programs such as Whole Person reduce costs and provide better outcomes for clients.<sup>[46]</sup> Based on this success, the Whole Person Program has been rolled out as Enhanced Care Management (ECM) starting in January 2022. The ECM program allows the providers to charge Medi-Cal for these services.

### ***Managed Care Services Provided***

The Enhanced Care Management programs focus on high-cost beneficiaries requiring high touch service with multiple needs, including mental health services.<sup>[47]</sup> The ECM programs provide each client with a lead case manager and each has a community health worker to assess needs. Health services are provided at County clinics. Services include assisting with housing and food needs in addition to mental and physical health support.<sup>[48]</sup>

Step-down programs manage the transition of clients from treatment to independent living. These programs often involve therapy, skills training, and medication management, all designed to help people transition back into the community successfully. These programs provide connection to both physical and behavioral health services. Managed care services are greatly enhanced with the availability of step-down programs. This will ensure there is a continuous glide path to wellness. Currently the County step-down services are severely limited. For example, ECM is offered as a new benefit to people released from incarceration as of January 2024.<sup>[49] [50]</sup>

### ***Challenges of Meeting the Demand for Managed Care Services***

Currently, ECM is reaching only 0.5% of the eligible ECM residents of Santa Cruz County.<sup>[51]</sup> There are 300-400 ECM clients currently enrolled countywide. The county has five different ECM programs at present. All of them have waiting lists.<sup>[52]</sup>

A major obstacle to expanding these services is the BHD job vacancy rate of up to 30%.<sup>[6]</sup> Additional case managers are needed to meet the patient demand. Case managers with the required experience and licensure are difficult to recruit and these positions often go unfilled for long periods of time. Providing additional services would have a negligible budget impact because these services are covered by Medi-Cal. The additional services provided by newly-hired case managers will be self-funding and therefore increased services will have negligible budget impact.

BHD is not currently using outcome-based metrics. Doing so will enable them to provide more effective services. Interviews indicated that patients are not typically surveyed for their functional skills and needs (such as done by ANSA). It is important to survey patients at intake, periodically during their time in the program and then finally when they leave the program. Interviewees also mentioned they had considered such surveys but didn't have the direction or scope to do so.<sup>[53] [54] [55]</sup> The RAND corporation had identified parameters for these surveys in its 2018 report.<sup>[56]</sup>

Despite the potential benefits of Managed Care Services in providing services for our most vulnerable Santa Cruz County residents with the help they need, the challenges with recruiting and funding make our ideal outcomes difficult to achieve.

## Conclusion

Santa Cruz has more homeless people per capita than anywhere else in California. A majority of these homeless residents are in need of behavioral health services. Compounding the problem is that the County's general budget is limited. Santa Cruz County is also an expensive place to live and therefore recruitment of health care providers is a challenge. Given these facts, Santa Cruz County is facing an uphill battle to provide adequate Behavioral Health Services both in terms of dollars and not having enough personnel. The Behavioral Health Services owes it to taxpayers to rigorously apply outcome-based metrics to determine which programs give the biggest bang for the buck.

The Grand Jury's preliminary analysis of regional service levels indicates South County residents have limited access to healthcare and lag other areas in socioeconomic indicators. Programs that improve socioeconomic indicators in South County will reduce behavioral healthcare and mental services costs in the long run.

## Findings

The Grand Jury wishes to acknowledge the fiscal limitations of Santa Cruz County. The findings and recommendations of this report are made with these fiscal restrictions in mind.

### ***Findings on Lack of Data Transparency***

- F1.** The County budget website lacks HSA Financial data visible to the public to ensure transparency of programs and funding efficacy.
- F2.** The County has limited staff to analyze the data for identifying trends which would allow focusing resources more effectively.

### ***Findings on Out-of-County Transfers and 95076 Zip Code***

- F3.** Zip code data can pinpoint areas of "High Need," which can direct data-driven funding for better health outcomes and give a better "Return on Investment."
- F4.** The 95076 zip code has an extraordinarily high number of patient transfers to outside the county compared to other zip codes of Santa Cruz county. This indicates a major lack of healthcare facilities and services to serve the community.
- F5.** A study of socioeconomic indicators of the 95076 zip code, compared to other zip codes of Santa Cruz county, reveal a dire need to improve the following:
  - Homelessness
  - Low Preschool Enrollment
  - Poor Health Care Access
  - Unemployment
  - Support for Single Parent Households

## ***Findings about Case Management***

- F6.** The ECM programs are currently at capacity and have waiting lists. More providers are needed to expand the program further to transition more residents to independent living.
- F7.** Though there is evidence that managed care programs like ECM are effective, lack of data leaves doubt in the public's mind. Data supporting the success rate of ECM programs would ensure stronger public support.

## **Recommendations**

- R1.** The Grand Jury recommends that Behavioral Health Services, in collaboration with the Chief Administrative Office Staff (CAO), provide a plan to report program performance on County websites. This plan should include data necessary to evaluate the effectiveness of each behavioral health program, including outcome-based metrics, patient feedback for each program, number of patients served, and financial details like budgeted expenses and revenue sources by program. This plan should be published by December 31, 2024. (F1, F2, F3)
- R2.** The Grand Jury recommends that the Board of Supervisors direct the CAO to implement performance budgeting of Behavioral Health Services over the next two-year budget cycle. This was also recommended by the 2017-2018 Grand Jury. The BoS should take this action by December 31, 2024. (F1)
- R3.** The Grand Jury recommends that because the 95076 zip code is the area of most need, Behavioral Health Division's Enhanced Care Management programs should focus efforts on identifying and case managing clients in this area by December 31, 2024. (F3, F4, F5, F6, F7)
- R4.** The Grand Jury recommends that Behavioral Health Services, County Office of Education, and the Board of Supervisors develop and publish a plan, with measurable outcomes, that focuses on improving socioeconomic indicators in the 95076 zip code by December 31, 2024. (F3, F4, F5)
- R5.** The Grand Jury recommends that Behavioral Health Services and the Board of Supervisors include an outcome-based evaluation of contracted services through a summary report that is publicly available. This should be done for all new and renewed contracts by December 31, 2024. (F1, F2, F4, F5, F7)

## **Commendations**

- C1.** County Behavioral Health Services are to be commended for their dedicated service to the community. They provide compassionate care with limited resources, all while being understaffed. Given the Behavioral Health Services high job vacancy rate, existing resource providers continue to provide exemplary services.

## Required Responses

<i>Respondent</i>	<i>Findings</i>	<i>Recommendations</i>	<i>Respond Within/ Respond By</i>
Santa Cruz County Board of Supervisors	F1–F7	R1–R5	90 Days September 9, 2024
Santa Cruz County Superintendent of Schools	F3–F5	R4	60 Days August 12, 2024

## Invited Responses

<i>Respondent</i>	<i>Findings</i>	<i>Recommendations</i>	<i>Respond Within/ Respond By</i>
Santa Cruz County Behavioral Health Services Director	F1–F7	R1–R5	90 Days September 9, 2024
Santa Cruz County Chief Administrative Officer	F1	R1	90 Days September 9, 2024

## Definitions

- **BHD:** Behavioral Health Division
- **CAO:** Chief Administrative Office - County Administrative Office supervises County departments and functions and is responsible for the County budget, strategic management initiatives, communications, legislative advocacy, intergovernmental relations, and emergency operations, as well as management of the Board of Supervisors' meeting agendas and records
- **CCHA:** California Central Coast Alliance for Health - Serve the Medi-Cal Managed Care for Santa Cruz County.<sup>[47]</sup>
- **CDC:** Centers for Disease Control and Prevention
- **ECM:** Enhanced Care Management - Statewide Medi-Cal benefit available to eligible members with complex needs, including:
  - Access to a single Lead Care Manager who provides comprehensive care management and coordinates their health and health-related care and services.
  - Connections to the quality care they need, no matter where members seek care—at the doctor, the dentist, with a social worker, or at a community center.<sup>[47]</sup>
- **EQR:** External Quality Review - an analysis and evaluation of aggregate information on access, timeliness, and quality of health care services by Behavioral Health Concepts, Inc.<sup>[57]</sup>

- **HCB:** High-cost beneficiary - Identified as those with approved claims of more than \$30,000 in a year
  - **HSA:** Health Services Agency
  - **MHI:** Mental Health Index - a measure of social determinants and health factors correlated with self-reported poor mental health<sup>[41]</sup>
  - **Performance Budgeting:** A performance budget is one that reflects both the input of resources and the output of services for each unit of an organization
  - **SDOH:** Social determinants of health - Social determinants of health (SDOH) are the nonmedical factors that influence health outcomes. They are the conditions in which people are born, grow, work, live, and age, and the wider set of forces and systems shaping the conditions of daily life<sup>[31]</sup>
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SANTA CRUZ  
COUNTY  
GRAND JURY

Grand Jury <grandjury@scgrandjury.org>

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## Responses to 2023-2024 Grand Jury Report "County Behavioral Health Services - A State of Mind"

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Caitlin Smith <Caitlin.Smith@santacruzcountyca.gov>

Tue, Sep 3, 2024 at 1:54 PM

Good Afternoon,

Please see attached for responses to the 2023-2024 Grand Jury Report titled "County Behavioral Health Services – A State of Mind" from the Santa Cruz County Board of Supervisors and the Santa Cruz County Superintendent of Schools which were approved by the Board of Supervisors on August 27, 2024.

Best,

Caitlin C. Smith

County Supervisors' Analyst

Santa Cruz County Board of Supervisors

[701 Ocean Street, Room 500](#)

[Santa Cruz, CA 95060](#)

831-454-2200 main

831-454-3516 direct

[caitlin.smith@santacruzcountyca.gov](mailto:caitlin.smith@santacruzcountyca.gov)

To email all five members of the Board of Supervisors at once,

please use: [boardofsupervisors@santacruzcountyca.gov](mailto:boardofsupervisors@santacruzcountyca.gov)

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### 3 attachments



**Cover Letter County Behavioral Health Services-A State of Mind.pdf**  
198K



**Board of Supervisors Response - County Behavioral Health Services - A State of Mind.pdf**  
500K



**Superintendent Response-County Behavioral Health - A State of Mind.pdf**  
261K



# County of Santa Cruz

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FIFTH DISTRICT

August 30, 2024

The Honorable Katherine Hansen  
Santa Cruz Courthouse  
701 Ocean Street  
Santa Cruz, CA 95060

**RE: Response to the 2023-2024 Grand Jury Report “County Behavioral Health Services – A State of Mind”**

Dear Judge Hansen,

The purpose of this letter is to formally transmit the Santa Cruz County Board of Supervisors’ and the Santa Cruz County Superintendent of Schools responses to the 2023-2024 Grand Jury Report “County Behavioral Health Services – A State of Mind.”

Sincerely,

JUSTIN CUMMINGS, Chair  
Santa Cruz County Board of Supervisors

JC:cs  
Attachments

CC: Clerk of the Board  
Santa Cruz County Grand Jury



The 2023–2024 Santa Cruz County Civil Grand Jury  
Requires the

**Santa Cruz County Board of Supervisors**

to Respond by September 9, 2024

to the Findings and Recommendations listed below  
which were assigned to them in the report titled

**County Behavioral Health Services – A State of Mind**

**Focus. Fund. Save.**

Responses are **required** from elected officials, elected agency or department heads, and elected boards, councils, and committees which are investigated by the Grand Jury. The California Penal Code (PC) [§933\(c\)](#) requires you to respond as specified below and to keep your response on file.

Your response will be considered **compliant** under [PC §933.05](#) if it contains an appropriate comment on **all** findings and recommendations **which were assigned to you** in this report.

Please follow the instructions below when preparing your response.

## Instructions for Respondents

Your assigned [Findings](#) and [Recommendations](#) are listed on the following pages with check boxes and an expandable space for summaries, timeframes, and explanations. Please follow these instructions, which paraphrase [PC §933.05](#):

1. **For the Findings, mark one of the following responses with an “X” and provide the required additional information:**
  - a. **AGREE with the Finding**, or
  - b. **PARTIALLY DISAGREE with the Finding** – specify the portion of the Finding that is disputed and include an explanation of the reasons why, or
  - c. **DISAGREE with the Finding** – provide an explanation of the reasons why.
2. **For the Recommendations, mark one of the following actions with an “X” and provide the required additional information:**
  - a. **HAS BEEN IMPLEMENTED** – provide a summary of the action taken, or
  - b. **HAS NOT YET BEEN IMPLEMENTED BUT WILL BE IN THE FUTURE** – provide a timeframe or expected date for completion, or
  - c. **REQUIRES FURTHER ANALYSIS** – provide an explanation, scope, and parameters of an analysis to be completed within six months, or
  - d. **WILL NOT BE IMPLEMENTED** – provide an explanation of why it is not warranted or not reasonable.
3. **Please confirm the date on which you approved the assigned responses:**

We approved these responses in a regular public meeting as shown  
in our minutes dated August 27, 2024.

4. **When your responses are complete, please email your completed Response Request as a PDF file attachment to both**

The Honorable Katherine Hansen, Grand Jury Supervising Judge  
[Katherine.Hansen@santacruzcourt.org](mailto:Katherine.Hansen@santacruzcourt.org) and

The Santa Cruz County Grand Jury [grandjury@scgrandjury.org](mailto:grandjury@scgrandjury.org).

**If you have questions about this request form, please contact the Grand Jury by calling 831-454-2099 or by sending an email to [grandjury@scgrandjury.org](mailto:grandjury@scgrandjury.org).**



## Findings

**F1.** The County budget website lacks HSA Financial data visible to the public to ensure transparency of programs and funding efficacy.

**AGREE**

**PARTIALLY DISAGREE**

**DISAGREE**

**Response explanation** (required for a response other than **Agree**):

The award-winning County budget website ([Proposed Health Services Agency 2024-25 Budget](#)) contains financial data viewable in several different ways; by revenue/expenditure type, division, and service. A service is defined as an operational unit within a department aimed at accomplishing a major governmental purpose or supporting the Operational Plan. The operational plan, a collection of objectives: measurable, time-bound, and inclusive tests of change that reflect the County's major work towards creating a healthy, safe, more affordable community, links budget appropriations to each service and is available on the County website. A [PDF](#) of the County Proposed 2024-25 Budget in Brief is also available.

**F2.** The County has limited staff to analyze the data for identifying trends which would allow focusing resources more effectively.

**AGREE**

**PARTIALLY DISAGREE**

**DISAGREE**

**Response explanation** (required for a response other than **Agree**):

The County has Analysts and other qualified staff with skills and tools necessary to analyze data, trends, and form recommendations to effectively allocate limited resources. Not all data is accessible to the County, but data sharing initiatives are advancing within County departments, which have the potential to improve resource allocation efficiencies, as well as advance care coordination, inform decision-making, and improve service delivery outcomes.

A significant number of population health reports and analysis can be found online at the Health Services Agency Website: [Population Health Data \(santacruzhealth.org\)](https://www.santacruzhealth.org/population-health-data)

**F3.** Zip code data can pinpoint areas of “High Need,” which can direct data-driven funding for better health outcomes and give a better “Return on Investment.”

- AGREE**
- PARTIALLY DISAGREE**
- DISAGREE**

**Response explanation** (required for a response other than **Agree**):

Zip code data can pinpoint areas of “High Need,” which can direct data-driven funding for better health outcomes and give a better “Return on Investment”, The BHD is responsible for the administration of the Specialty Mental Health and Drug Medi-Cal Health Plans and the provision of care to Medi-Cal beneficiaries who meet health criteria, based on individual need, under these health plans. Often, these beneficiaries are living with life-long diagnoses and improvement is measured by maintenance or improvement in functioning and self-reported metrics.

**F4.** The 95076 zip code has an extraordinarily high number of patient transfers to outside the county compared to other zip codes of Santa Cruz county. This indicates a major lack of healthcare facilities and services to serve the community.

**AGREE**

**PARTIALLY DISAGREE**

**DISAGREE**

**Response explanation** (required for a response other than **Agree**):

The County is committed to retaining the existing health care facilities and services that support all County residents, including 95076 zip code residents, and has committed to expanding the availability of facilities and services. The County has made significant investments with its community partners to purchase and keep open Watsonville Community Hospital and has recently purchased a building to establish an in-County youth crisis stabilization facility. In addition, the County relocated services at Westridge, increasing accessibility to South County.

If the finding is only related to Behavioral Health transfers, then the data referenced in the Grand Jury report is too broad, as that data appears to include all patient transfers for any health need, not only behavioral health, regardless of insurance provider. The County is responsible for the payment of hospital services only for patient transfers for inpatient psychiatry for Medi-Cal beneficiaries.

Due to Federal legislation, inpatient psychiatric facilities that are not attached to an acute care hospital are capped at 16 beds. As a result, Santa Cruz County has only one inpatient psychiatric health facility (also known as the PHF) of 16 beds located at 2250 Soquel Ave, Santa Cruz. The County Specialty Mental Health Plan contracts with Telecare to deliver the health services in that facility.

If this finding is regarding lack of healthcare facilities and services to Medi-Cal beneficiaries, the responsibility and the data is held by the Medi-Cal Managed Care Plans (MCPs). In Santa Cruz County, the MCPs are the Central California Alliance for Health (CAAH) and Kaiser Permanente, which are accountable to the State of California's Department of Health Care Services (DHCS) for maintaining network adequacy requirements.

If this finding is regarding lack of healthcare facilities and services to private insurance members, the responsibility and the data is held by the Managed Care Plans (MCPs). There are many MCPs that provide health care coverage for Santa Cruz County residents, such as Anthem, Blue Shield, Kaiser Permanente, and others. The non-Medi-Cal MCPs are accountable to the State of California's Department of Managed Health Care (DMHC) for maintaining network adequacy requirements.

**F5.** A study of socioeconomic indicators of the 95076 zip code, compared to other zip codes of Santa Cruz county, reveal a dire need to improve the following:

- Homelessness
- Low Preschool Enrollment
- Poor Health Care Access
- Unemployment
- Support for Single Parent Households

**AGREE**

**PARTIALLY DISAGREE**

**DISAGREE**

**Response explanation** (required for a response other than **Agree**):

Santa Cruz County's DataShareSCC provides dozens of indicators related to community health and well-being. <https://www.datasharescc.org/>  
The data shows similar findings. The Public Health Division-led Community Health Assessment (CHA) will be published in August 2024, and preliminary results also show findings that concur.

**F6.** The ECM programs are currently at capacity and have waiting lists. More providers are needed to expand the program further to transition more residents to independent living.

**AGREE**

**PARTIALLY DISAGREE**

**DISAGREE**

**Response explanation** (required for a response other than **Agree**):

The County does not have data on waiting lists or patient need for the Enhanced Care Management (ECM) program. The Enhanced Care Management is a Medi-Cal entitlement that is the responsibility of the Medi-Cal Managed Care Plans (MCPs) and administered through the MCPs. In Santa Cruz County, there are two Medi-Cal MCPs – Central California Alliance for Health (CCAH) and Kaiser Permanente. Those organizations are responsible for the ECM programs, not the County. The County Health Services Agency is merely one of many contractors to CCAH to provide the ECM program to some Medi-Cal beneficiaries. The waitlist information would be the responsibility of the MCPs.

**F7.** Though there is evidence that managed care programs like ECM are effective, lack of data leaves doubt in the public’s mind. Data supporting the success rate of ECM programs would ensure stronger public support.

- AGREE**
- PARTIALLY DISAGREE**
- DISAGREE**

**Response explanation** (required for a response other than **Agree**):

The County does not have data on the effectiveness of the Enhanced Care Management (ECM) program at this time. The Enhanced Care Management is a Medi-Cal entitlement that is the responsibility of the Medi-Cal Managed Care Plans (MCPs) and administered through the MCPs. In Santa Cruz County there are two Medi-Cal MCPs – Central California Alliance for Health (CAAH) and Kaiser Permanente. Those organizations are responsible for the ECM programs, not the County. The County Health Services Agency is merely one of many contractors to CCAH to provide the ECM program to some Medi-Cal beneficiaries. Effectiveness information would be the responsibility of the MCPs.

## Recommendations

**R1.** The Grand Jury recommends that Behavioral Health Services, in collaboration with the Chief Administrative Office Staff (CAO), provide a plan to report program performance on County websites. This plan should include data necessary to evaluate the effectiveness of each behavioral health program, including outcome-based metrics, patient feedback for each program, number of patients served, and financial details like budgeted expenses and revenue sources by program. This plan should be published by December 31, 2024. (F1, F2, F3)

- HAS BEEN IMPLEMENTED** – summarize what has been done
- HAS NOT YET BEEN IMPLEMENTED BUT WILL BE IN THE FUTURE** – summarize what will be done and the timeframe
- REQUIRES FURTHER ANALYSIS** – explain the scope and timeframe (not to exceed six months)
- WILL NOT BE IMPLEMENTED** – explain why

### Required response explanation, summary, and timeframe:

The County Health Services Agency and its Behavioral Health Division (BHD) publish the External Quality Review Organization (EQRO) Reports for the Mental Health Plan and Drug Medi-Cal Plan's quality performance on the Behavioral Health website ([Medi-Cal Specialty Behavioral Health External Quality Review- MHP](#) and [Medi-Cal Specialty Behavioral Health External Quality Review- DMC-ODS](#)). This is a state-administered network adequacy and quality audit of County BHD that is conducted by an external organization, independent of the County of Santa Cruz and BHD.

The County budget website links expenditure and revenue appropriations to each service. A service is defined as an operational unit within a department aimed at accomplishing a major governmental purpose or supporting the Operational Plan. The Behavioral Health Division of the Health Services Agency has seven services that can be explored at this link (Health Services Agency [Proposed 2024-25 Budget](#)).

Beginning in Fall 2024 through Spring 2025, a Public Health Division-led Community Health Improvement Plan (CHIP) will be developed using a community engagement framework (MAPP 2.0), based on the CHA findings. If the community engaged process finds 95076 zip code and associated indicators to be a priority to include in the CHIP, elements of this recommendation may appear in the CHIP in mid-2025.



**R2.** The Grand Jury recommends that the Board of Supervisors direct the CAO to implement performance budgeting of Behavioral Health Services over the next two-year budget cycle. This was also recommended by the 2017-2018 Grand Jury. The BoS should take this action by December 31, 2024. (F1)

- HAS BEEN IMPLEMENTED** – summarize what has been done
- HAS NOT YET BEEN IMPLEMENTED BUT WILL BE IN THE FUTURE** – summarize what will be done and the timeframe
- REQUIRES FURTHER ANALYSIS** – explain the scope and timeframe (not to exceed six months)
- WILL NOT BE IMPLEMENTED** – explain why

**Required response explanation, summary, and timeframe:**

The County budget website links applicable operational objectives that contain measurable and time-bound tests of change to budget appropriations at the service level. A service is defined as an operational unit within a department aimed at accomplishing a major governmental purpose or supporting the Operational Plan. The Operational Plan is renewed every two years while the Budget is adopted annually. The Health Service Agency’s Budget and linked operational objectives can be found at this link: Health Services Agency [Proposed 2024-25 Budget](#).

Few counties are linking their operational efforts to their budgets in this way. In 2022, the California State Association of Counties (CSAC) awarded Santa Cruz County a Challenge Award recognizing the innovation in integrating the plans.

**R3.** The Grand Jury recommends that because the 95076 zip code is the area of most need, Behavioral Health Division’s Enhanced Care Management programs should focus efforts on identifying and case managing clients in this area by December 31, 2024. (F3, F4, F5, F6, F7)

- HAS BEEN IMPLEMENTED** – summarize what has been done
- HAS NOT YET BEEN IMPLEMENTED BUT WILL BE IN THE FUTURE** – summarize what will be done and the timeframe
- REQUIRES FURTHER ANALYSIS** – explain the scope and timeframe (not to exceed six months)
- WILL NOT BE IMPLEMENTED** – explain why

**Required response explanation, summary, and timeframe:**

Enhanced Care Management (ECM) is a Medi-Cal entitlement that is the responsibility of the Medi-Cal Managed Care Plans (MCPs) and administered through the MCPs. In Santa Cruz County there are two Medi-Cal MCPs – Central California Alliance for Health (CAAH) and Kaiser Permanente. Those organizations are responsible for the ECM programs, not the County. The County Health Services Agency is merely one of many contractors to CCAH to provide the ECM program to some Medi-Cal beneficiaries.

The Behavioral Health Division will begin offering ECM services to all Adult Specialty Mental Health beneficiaries regardless of zip code, through HSA's ECM contract with the Central California Alliance for Health, by December 2024. The County BHD will offer ECM to all Specialty Mental Health beneficiaries based on the population priorities outlined by ECM requirements, as such staff will ensure an equity lens is at the forefront of the work.

**R4.** The Grand Jury recommends that Behavioral Health Services, County Office of Education, and the Board of Supervisors develop and publish a plan, with measurable outcomes, that focuses on improving socioeconomic indicators in the 95076 zip code by December 31, 2024. (F3, F4, F5)

**HAS BEEN IMPLEMENTED** – summarize what has been done

**HAS NOT YET BEEN IMPLEMENTED BUT WILL BE IN THE FUTURE** – summarize what will be done and the timeframe

**REQUIRES FURTHER ANALYSIS** – explain the scope and timeframe (not to exceed six months)

**WILL NOT BE IMPLEMENTED** – explain why

**Required response explanation, summary, and timeframe:**

Beginning in Fall 2024 through Spring 2025, a Public Health Division-led Community Health Improvement Plan (CHIP) will be developed using a community engagement framework (MAPP 2.0), based on the CHA findings. If the community engaged process finds 95076 zip code and associated indicators to be a priority to include in the CHIP, elements of this recommendation may appear in the CHIP in mid-2025. The 2018-23 Community Health Improvement Plan (CHIP) can be viewed on the DataShare Santa Cruz County website ([datasharescc.org](http://datasharescc.org)).

**R5.** The Grand Jury recommends that Behavioral Health Services and the Board of Supervisors include an outcome-based evaluation of contracted services through a summary report that is publicly available. This should be done for all new and renewed contracts by December 31, 2024. (F1, F2, F4, F5, F7)

- HAS BEEN IMPLEMENTED** – summarize what has been done
- HAS NOT YET BEEN IMPLEMENTED BUT WILL BE IN THE FUTURE** – summarize what will be done and the timeframe
- REQUIRES FURTHER ANALYSIS** – explain the scope and timeframe (not to exceed six months)
- WILL NOT BE IMPLEMENTED** – explain why

**Required response explanation, summary, and timeframe:**

Behavioral Health Contractors utilize best practices, which are backed by scientific research conducted in controlled setting. Behavioral Health contracts have evaluation metrics, many of which it is the mechanism in which contractors are paid for the service.

While allocating the significant time and resources necessary to design and implement a system-wide outcomes evaluation is not possible at this time, Santa Cruz County's DataShareSCC provides dozens of indicators related to community health and well-being ([datasharescc.org](http://datasharescc.org)). Additionally, the Public Health Division-led Community Health Assessment (CHA) will be published in August 2024, and there are overlapping elements that should contribute to a broader understanding.



SANTA CRUZ  
COUNTY  
GRAND JURY

Grand Jury <jgrandjury@scgrandjury.org>

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## Response to Civil Grand Jury Response

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**Faris Sabbah** <fsabbah@santacruzcoe.org>

Mon, Aug 12, 2024 at 8:00 AM

To: Katherine.Hansen@santacruzcourt.org, grandjury@scgrandjury.org

Cc: Nick Ibarra <nibarra@santacruzcoe.org>

Dear Judge Hansen and Members of the Santa Cruz County Civil Grand Jury,

Please find attached my response to the Civil Grand Jury report of June 11, 2024, entitled "County Behavioral Health Services – A State of Mind." As required under California Penal Code §933(c), my response addresses all findings and recommendations assigned to me in the report.

I would also like to express my gratitude for the hard work and dedication of the members of the 2023-24 Civil Grand Jury. Thank you for your commitment to improving our county.

Should you have any questions or require additional information, please do not hesitate to contact me directly.

Sincerely,  
Dr. Faris Sabbah  
Santa Cruz County Superintendent of Schools



DR. FARIS SABBABH  
SUPERINTENDENT OF SCHOOLS

**Dr. Faris Sabbah**

County Superintendent of Schools

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www.santacruzcoe.org

400 Encinal St. Santa Cruz, CA 95060

pronouns: he, him, his



**Santa Cruz County Office of Education**

[www.santacruzcoe.org](http://www.santacruzcoe.org)



**2024-7bR HSA SoS Required Response Request - COMPLETED.pdf**

444K



**The 2023–2024 Santa Cruz County Civil Grand Jury  
Requires the  
Santa Cruz County Superintendent of Schools  
to Respond by August 12, 2024  
to the Findings and Recommendations listed below  
which were assigned to them in the report titled  
County Behavioral Health Services – A State of Mind  
Focus. Fund. Save.**

Responses are **required** from elected officials, elected agency or department heads, and elected boards, councils, and committees which are investigated by the Grand Jury. The California Penal Code (PC) [§933\(c\)](#) requires you to respond as specified below and to keep your response on file.

Your response will be considered **compliant** under [PC §933.05](#) if it contains an appropriate comment on **all** findings and recommendations **which were assigned to you** in this report.

Please follow the instructions below when preparing your response.

## Instructions for Respondents

Your assigned [Findings](#) and [Recommendations](#) are listed on the following pages with check boxes and an expandable space for summaries, timeframes, and explanations. Please follow these instructions, which paraphrase [PC §933.05](#):

1. ***For the Findings, mark one of the following responses with an “X” and provide the required additional information:***
  - a. **AGREE with the Finding**, or
  - b. **PARTIALLY DISAGREE with the Finding** – specify the portion of the Finding that is disputed and include an explanation of the reasons why, or
  - c. **DISAGREE with the Finding** – provide an explanation of the reasons why.
  
2. ***For the Recommendations, mark one of the following actions with an “X” and provide the required additional information:***
  - a. **HAS BEEN IMPLEMENTED** – provide a summary of the action taken, or
  - b. **HAS NOT YET BEEN IMPLEMENTED BUT WILL BE IN THE FUTURE** – provide a timeframe or expected date for completion, or
  - c. **REQUIRES FURTHER ANALYSIS** – provide an explanation, scope, and parameters of an analysis to be completed within six months, or
  - d. **WILL NOT BE IMPLEMENTED** – provide an explanation of why it is not warranted or not reasonable.
  
3. ***When your responses are complete, please email your completed Response Request as a PDF file attachment to both***

The Honorable Katherine Hansen, Grand Jury Supervising Judge  
[Katherine.Hansen@santacruzcourt.org](mailto:Katherine.Hansen@santacruzcourt.org) and

The Santa Cruz County Grand Jury [grandjury@scgrandjury.org](mailto:grandjury@scgrandjury.org).

***If you have questions about this request form, please contact the Grand Jury by calling 831-454-2099 or by sending an email to [grandjury@scgrandjury.org](mailto:grandjury@scgrandjury.org).***

## Findings

- F3.** Zip code data can pinpoint areas of “High Need,” which can direct data-driven funding for better health outcomes and give a better “Return on Investment.”

- AGREE**  
 **PARTIALLY DISAGREE**  
 **DISAGREE**

**Response explanation** (required for a response other than **Agree**):

ZIP Code data is an important indicator of need as part of a holistic assessment of community health. However, in isolation it can be insufficiently granular or comprehensive to be used to direct funding decisions – even where that degree of flexibility exists in health funding disbursement, which in many cases it does not. Instead, ZIP Code data should be used alongside other indicators of community health as part of a comprehensive analysis. Within the school community for example, districtwide and school-site data sources are often as or more relevant to funding decisions as ZIP Code data. Census tract data provides another important, and more granular, geographic lens. It is also essential to note that eligibility for health services is generally based on individual need, regardless of ZIP Code within Santa Cruz County. This is not to say there is no place for ZIP Code based data; it can help to target outreach campaigns, and, in the context of other data, serves as an important indicator of progress addressing health inequities.



**F4.** The 95076 zip code has an extraordinarily high number of patient transfers to outside the county compared to other zip codes of Santa Cruz county. This indicates a major lack of healthcare facilities and services to serve the community.

- AGREE**
- PARTIALLY DISAGREE**
- DISAGREE**

**Response explanation** (required for a response other than **Agree**):

This finding does not directly relate to programs or data under the purview of the Santa Cruz County Superintendent of Schools or the Santa Cruz County Office of Education (COE). We anticipate a more detailed response from the Health Services Agency (HSA), and would generally defer to the HSA's expertise on this matter. However, a review of the Civil Grand Jury's analysis in support of this finding raises several concerns. For instance, it does not appear that the Civil Grand Jury analysis adjusted for the population of each ZIP Code while performing its analysis. While these irregularities call into question the specifics of the analysis, it is the position of the Santa Cruz County Superintendent of Schools that the conclusion of this finding is directionally accurate: the 95076 ZIP Code requires focused attention to continue improving health care facilities and resources. Continuing to expand access to healthcare facilities and services in South Santa Cruz County is a key priority for the COE as part of a broad coalition of partners, including through the school-based wellness initiatives through which we are expanding students' access to mental health support to address any level of need. The Pediatric Health Work Group, of which the COE is a member, is one focal point for this work as it relates to youth in our community. The Pediatric Health Work Group has identified disparities in BMI and other health indicators that point to persistent health inequities disproportionately affecting youth in the 95076 ZIP Code. In response, the COE convened work groups of educators and topical experts in Spring 2024 to assess how schools can work more closely with families and health providers to share actionable information and best practices – whether in classrooms and cafeterias, or at home. We anticipate a report based on these findings will be released in Fall 2024.

**F5.** A study of socioeconomic indicators of the 95076 zip code, compared to other zip codes of Santa Cruz county, reveal a dire need to improve the following:

- Homelessness
- Low Preschool Enrollment
- Poor Health Care Access
- Unemployment
- Support for Single Parent Households

**AGREE**

**PARTIALLY DISAGREE**

**DISAGREE**

**Response explanation** (required for a response other than **Agree**):

## Recommendations

**R4.** The Grand Jury recommends that Behavioral Health Services, County Office of Education, and the Board of Supervisors develop and publish a plan, with measurable outcomes, that focuses on improving socioeconomic indicators in the 95076 zip code by December 31, 2024. (F3, F4, F5)

- HAS BEEN IMPLEMENTED** – summarize what has been done
- HAS NOT YET BEEN IMPLEMENTED BUT WILL BE IN THE FUTURE** – summarize what will be done and the timeframe
- REQUIRES FURTHER ANALYSIS** – explain the scope and timeframe (not to exceed six months)
- WILL NOT BE IMPLEMENTED** – explain why

### Required response explanation, summary, and timeframe:

After consulting with the partners referenced by the Civil Grand Jury, it is the determination of the Santa Cruz County Superintendent of Schools that it would not be an efficient or effective use of resources to produce an entirely new plan in this timeframe that is focused exclusively on the 95076 ZIP Code. Such a plan would overlap significantly with numerous existing plans and processes. These include the Community Health Improvement Plan which is set to begin this fall, as well as the Santa Cruz County Health Service Agency's 2025 Strategic Plan and in some respects the Collective of Results and Evidence-based (CORE) Investments funding model. In addition, the COE is working closely with regional partners through the Central Coast K-16 Collaborative to address long-standing social and economic inequities in higher education and workforce participation through creation of classroom to career pathways in fields including health, computer science and education. The COE would reconsider participation in the plan proposed by the Civil Grand Jury should a need for it emerge from a community-led process tied to more targeted, evidence-based outcomes.