



June 7, 2022

The Honorable Jim Wood, Chair
Assembly Health Committee
1020 N Street, Room 390
Sacramento, CA 95814

RE: SB 970 (Eggman) – Concerns

Dear Assembly Member Wood:

Mental Health America of California (MHAC) is a peer-run organization that has been leading the state in behavioral health public policy and advocacy since 1957. The mission of MHAC is to ensure that people of all ages, sexual orientation, gender identity or expression, language, race, ethnicity, national origin, immigration status, spirituality, religion, age or socioeconomic status who require mental health services and supports are able to live full and productive lives, receive the mental health services and other services that they need, and are not denied any other benefits, services, rights, or opportunities based on their need for mental health services. Along these lines, we support efforts which increase access to voluntary, community-based services, and efforts which maintain the intent of the Mental Health Services Act (MHSA).

We are writing today to express concerns with SB 970 as amended on May 2, 2022, related to the proposed Mental Health Services Act Outcomes and Accountability Review (MHSA-OAR). While the structure of accountability and system/quality improvement proposed in SB 970 includes sound components—performance indicators using process and outcome measures, peer review, county self-assessment, and system improvement plans—these have all been included in previous attempts by the state to design an oversight system. However, MHSA accountability has consistently been spread among various state agencies with overlapping mandates, a lack of follow-through, and an insufficient investment in the production and analysis of data essential to develop indicators across counties and time. Additionally, these evaluation and oversight efforts generally focus on only a portion of the public community mental health system, often by funding source, Medi-Cal or MHSA.

California's public mental health system has braided funding from three primary sources—Medi-Cal, MHSA, and realignment—to provide the array of services critical to addressing the needs of the population served. These services are often used in concert with each other, such as MHSA funds used to provide matching funds for the federal Medi-Cal funding. The result of this is that the outcomes the state hopes to achieve and measure are dependent on services funded through multiple funding sources. Any process and outcome measures should primarily be focused on the entire public mental health system, not limited exclusively to programs funded by the MHSA.

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The proposed MHSOAR mandates each county to measure and publicly report progress on process and outcome indicators. Yet counties could use different data sources and formulas, which will result in data that is not comparable across counties. To have comparability, the state must calculate the process and outcome indicators for all counties. The counties could then supplement the statewide indicators with others of their choosing.

Presently, oversight of the MHSOAR is spread among the Mental Health Services Oversight and Accountability Commission (MHSOAC), the Department of Health Care Services (DHCS), and the California Behavioral Health Planning Council. It is unclear how giving the responsibility for outcomes accountability of the MHSOAR to a fourth entity will result in achieving the goals of this legislation.

While we support efforts to measure and improve public mental health system outcomes, we believe that the MHSOAR defined in SB 970 will not succeed at either of these goals. Instead, we encourage the Legislature to establish an oversight mechanism, within an existing oversight authority, that considers California's complex funding streams and diverse county systems.

If you have any questions and or if Mental Health America of California can be of any assistance on this or any other behavioral health bill, please contact me or our Interim Director of Public Policy Karen Vicari at kvicari@mhaofca.org.

In Community,



Heidi L. Strunk
President & CEO