

7/26/16



County of San Diego

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July 21, 2016

The Honorable Jeffrey B. Barton
Presiding Judge, San Diego Superior Court
220 West Broadway
San Diego, CA 92101

Dear Judge Barton,

The 2015-2016 San Diego County Grand Jury recently completed its term and filed eight reports with recommendations requiring a response from the County of San Diego. On July 19, 2016, the County Board of Supervisors approved responses to these eight reports and directed me to forward the responses to your office, as required by the California Penal Code.

The responses, which are enclosed, correspond to the following reports:

- Psychiatric Emergency Response Team
- San Diego County Sheriff's Department Inmate Welfare Fund
- Citizen Oversight Boards of Police Behavior
- Detention Facilities – San Diego County
- Realignment Challenges In San Diego County Jails Improving Long-Term Incarceration
- Campaign Law Enforcement & Training – City and County of San Diego
- Mental Health Services Act In San Diego County
- Long Term Psychiatric Beds in San Diego County

I thank the Grand Jury for their commitment to this process. If you have questions or need additional information, please contact me at (619) 531-5250.

Sincerely,

HELEN N. ROBBINS-MEYER
Chief Administrative Officer

Attachment

cc: Board of Supervisors



COUNTY OF SAN DIEGO

AGENDA ITEM

BOARD OF SUPERVISORS

GREG COX
First District

DIANNE JACOB
Second District

DAVE ROBERTS
Third District

RON ROBERTS
Fourth District

BILL HORN
Fifth District

DATE: July 19, 2016

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TO: Board of Supervisors

SUBJECT: RESPONSE TO 2015-16 GRAND JURY REPORTS (DISTRICTS: ALL)

Overview

The 2015-2016 San Diego County Grand Jury recently completed its term and filed eight reports with recommendations requiring a response from the County.

California Penal Code Section 933(c) requires that (A) the governing body of agencies that are the subject of Grand Jury reports respond in writing to the Findings and Recommendations addressed to such agencies and (B) elected officials such as the Sheriff and District Attorney respond on behalf of their respective agencies.

Therefore, this is a request for your Board to review and approve the draft Finding and Recommendation responses prepared by the Chief Administrative Officer and authorize the Chief Administrative Officer to transmit the responses to the Grand Jury via the Superior Court Presiding Judge. The proposed responses address the recommendations and findings contained in following eight reports and note the recommendations to which the Sheriff will respond separately:

- Psychiatric Emergency Response Team
- San Diego County Sheriff's Department Inmate Welfare Fund
- Citizen Oversight Boards of Police Behavior
- Detention Facilities – San Diego County
- Realignment Challenges In San Diego County Jails Improving Long-Term Incarceration
- Campaign Law Enforcement & Training – City and County of San Diego
- Mental Health Services Act In San Diego County
- Long Term Psychiatric Beds in San Diego County

Recommendation(s)

CHIEF ADMINISTRATIVE OFFICER

1. Approve the proposed responses and authorize the Chief Administrative Officer to transmit the responses to the Grand Jury via the Superior Court Presiding Judge.
2. Direct the Chief Administrative Officer to submit a copy of the Past Grand Jurors

SUBJECT: RESPONSE TO 2015-16 GRAND JURY REPORTS (DISTRICTS: ALL)

Association Implementation Review Committee's 2017 Annual Report to the Board of Supervisors, no later than December 31, 2017, which provides updates to the County's responses to the 2015-16 Grand Jury report recommendations.

Fiscal Impact

These recommendations have no fiscal impact.

Business Impact Statement

N/A

Advisory Board Statement

N/A

Background

The 2015-2016 San Diego County Grand Jury recently completed its term and filed eight reports, each of which includes recommendations requiring a response from the County.

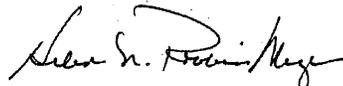
California Penal Code Section 933(c) requires that (A) the governing body of agencies that are the subject of Grand Jury reports respond in writing to the Findings and Recommendations addressed to such agencies and (B) elected officials such as the Sheriff and District Attorney respond on behalf of their respective agencies. Copies of all Grand Jury reports and the subject agencies' responses to them are posted on the Grand Jury website.

This is a request for your Board to review and approve the draft Finding and Recommendation responses prepared by the Chief Administrative Officer and authorize the Chief Administrative Officer to transmit the responses to the Grand Jury via the Superior Court Presiding Judge. The proposed responses address the recommendations and findings contained in eight reports referenced and note the recommendations to which the Sheriff will respond separately.

Linkage to the County of San Diego Strategic Plan

The Grand Jury reports listed above and the County's corresponding responses address matters associated with all four of the County of San Diego's 2016-21 Strategic Initiatives of Operational Excellence, Safe Communities, Sustainable Environments and Healthy Families.

Respectfully submitted,



HELEN N. ROBBINS-MEYER
Chief Administrative Officer

ATTACHMENT(S)

2015-16 County of San Diego Grand Jury Responses

SUBJECT: RESPONSE TO 2015-16 GRAND JURY REPORTS (DISTRICTS: ALL)

AGENDA ITEM INFORMATION SHEET

REQUIRES FOUR VOTES: Yes No

WRITTEN DISCLOSURE PER COUNTY CHARTER SECTION 1000.1 REQUIRED
 Yes No

PREVIOUS RELEVANT BOARD ACTIONS:
N/A

BOARD POLICIES APPLICABLE:
A-43 Response to Grand Jury Reports

BOARD POLICY STATEMENTS:
N/A

MANDATORY COMPLIANCE:
N/A

ORACLE AWARD NUMBER(S) AND CONTRACT AND/OR REQUISITION NUMBER(S):
N/A

ORIGINATING DEPARTMENT: Chief Administrative Office

OTHER CONCURRENCES(S): Public Safety Group
Health and Human Services Agency
Probation Department
Office of Financial Planning

CONTACT PERSON(S):

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COUNTY OF SAN DIEGO RESPONSES
TO
2015-2016 GRAND JURY REPORTS

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COUNTY OF SAN DIEGO RESPONSE TO 2015-16 GRAND JURY REPORT
“Psychiatric Emergency Response Team”
Filed May 23, 2016

(The finding and Recommendation 16-04 will be separately responded to by the Sheriff)

COUNTY OF SAN DIEGO RESPONSE TO 2015-16 GRAND JURY REPORT
“San Diego County Sheriff's Department Inmate Welfare Fund”
Filed May 23, 2016

(Findings 01 through 07 and Recommendation 16-05 through 16-11 will be separately responded to by the Sheriff)

COUNTY OF SAN DIEGO RESPONSE TO 2015-16 GRAND JURY REPORT
“Citizen Oversight Boards of Police Behavior”
Filed May 25, 2016

FINDINGS

Finding 01: Due to the large geographic area under CLERB's jurisdiction, modest compensation and reimbursement of expenses to board members could encourage greater community involvement and increase board diversity.

Response: The Chief Administrative Officer disagrees with this finding. The Charter of the County of San Diego, Section 606, Citizens' Law Enforcement Review Board, states the “Members ... shall serve without compensation....” Charter Section 913, Reimbursement for Travel, does provide for reimbursement for travel expenses, and San Diego County Code of Administrative Ordinances Section 340.8, Compensation, already provides for reimbursement of expenses incurred in performing CLERB Member duties. It does not appear that additional compensation is needed to increase board diversity and community involvement.

RECOMMENDATIONS

The 2015/2016 Grand Jury recommends that the San Diego County Chief Administrative Officer:

16-29: Provide modest compensation for board member time and expenses.

Response: This recommendation will not be implemented because it is not warranted. The Citizens' Law Enforcement Review Board (CLERB) is authorized to receive reimbursement for expenses incurred while performing the required job functions. CLERB also has a diverse membership, comprised of eleven qualified electors of San Diego County, possessing a reputation for integrity and responsibility, and an active interest in public affairs and service. The appointed CLERB members represent all five supervisorial districts, with members currently residing in the cities of Chula Vista, Imperial Beach, La Mesa, San Diego, Valley Center, and Vista. Ten of the eleven appointments were filled at the time of this writing, with five women and five men representing White, African-American, Asian, and Hispanic communities. Membership includes small business owners, human resource professionals, retired military officers, legal professionals, and retired government officials.

The Charter of the County of San Diego, Section 606, Citizens' Law Enforcement Review Board, states the "Members ... shall serve without compensation... ." Charter Section 913, Reimbursement for Travel, does provide for reimbursement for travel expenses, and San Diego County Code of Administrative Ordinances Section 340.8, Compensation, already provides for reimbursement of expenses incurred in performing CLERB Member duties. It does not appear that additional compensation is needed to increase board diversity and community involvement.

**COUNTY OF SAN DIEGO RESPONSE TO 2015-16 GRAND JURY REPORT
"Detention Facilities San Diego County"
Filed June 1, 2016**

(Findings 01 through 06 and Recommendation 16-42 through 16-45 will be separately responded to by the Sheriff)

FINDINGS

Finding 07: The Probation Department cannot make evidence-based conclusions on which programs should be expanded or discontinued.

Response: The Probation Department disagrees partially with this finding. The Probation Department is committed to evidence-based practices in all areas of operations. Over the past few years, the department has developed criteria and trained staff in evidence-based programming. At the time of the inspection, the department had not yet implemented a comprehensive evidence-based method of evaluating individual programs. Beginning September 2015, the department implemented the validated evidence-based Correctional Program Checklist (CPC) - a tool used to ascertain how closely correctional programs meet known principles of

effective intervention in addressing the unique needs of offender populations in order to reduce recidivism.

Finding 08: The Probation Department should consider outsourcing laundry for the juvenile facilities.

Response: The Probation Department agrees with this finding.

Finding 09: Closing a juvenile facility may be warranted.

Response: The Probation Department disagrees partially with this finding. The Probation Department has evaluated and will continue to evaluate possible consolidation of the facilities. However, there is not enough available capacity at East Mesa Juvenile Detention Facility (EMJDF) to accommodate consolidation of the Kearny Mesa Juvenile Detention Facility (KMJDF) and Girls Rehabilitation Facility (GRF) populations at that location. The proximity of KMJDF to Juvenile Court makes it ideal for youth going through the Court process. Further, it allows easy access for attorneys, probation officers, treatment providers and families to visit the youth and conduct the necessary evaluations and interviews needed while the youth are going through the Court process.

Finding 10: Issues including distance to facilities make visiting juveniles difficult for some family members.

Response: The Probation Department agrees with this finding.

RECOMMENDATIONS

The 2015/2016 San Diego County Grand Jury recommends that the San Diego County Board of Supervisors

16-48: Establish metrics to evaluate programs and then initiate evaluations.

Response: This recommendation has been implemented. A process of evaluating programs and initiating evaluations was implemented in September 2015 through the use of the Correctional Program Checklist (CPC). The CPC is a validated, evidence-based tool used to ascertain how closely correctional programs meet known principles of effective intervention in addressing the unique needs of offender populations in order to reduce recidivism.

16-49: Pursue an agreement with EMRF for most juvenile facility laundry services to improve laundry efficiency and reduce costs.

Response: This recommendation requires further analysis. By December 1, 2016, the Probation Department will consult with the Sheriff's Department and evaluate whether an outsourcing of juvenile laundry to the East Mesa Reentry Facility is viable for both Departments.

16-50: Develop a long-range plan to determine the feasibility and advisability of consolidation of facilities.

Response: This recommendation requires further analysis. The Probation Department recently consolidated the Juvenile Ranch Facility in Campo with the Camp Barrett program in Alpine. The Probation Department is continually looking at the populations housed at all facilities. The possibility of consolidation will be further analyzed as part of the County's project to evaluate all buildings over 50 years old, which includes the Kearny Mesa Juvenile Detention Facility. By December 1, 2016, the Probation Department will develop a juvenile institutions master plan focused on the Kearny Mesa juvenile complex by consulting with County departments and external stakeholders.

16-51: Evaluate the options for establishing video visitation equipment similar to that provided in adult detention facilities.

Response: This recommendation has been implemented. The Probation Department has implemented Skype and Google Hangout at Camp Barrett and East Mesa Juvenile Detention Facility in order to increase the family visits for youth.

**COUNTY OF SAN DIEGO RESPONSE TO 2015-16 GRAND JURY REPORT
"Realignment Challenges In San Diego County jails Improving Long-Term Incarceration"
Filed June 2, 2016**

(Findings 01, thru 03 and Recommendations 16-52 thru 16-57 will be separately responded to by the Sheriff)

**COUNTY OF SAN DIEGO RESPONSE TO 2015-16 GRAND JURY REPORT
"Campaign Law Enforcement & Training – City and County of San Diego"
Filed June 8, 2016**

FINDINGS

Finding 06: Elected county officials, lobbyists and candidates would benefit from additional training and enforcement of campaign laws.

Response: The Chief Administrative Officer disagrees partially with this finding. The County agrees that elected county officials would benefit from additional training and the County will be providing the training; however, the County does not believe a separate training for candidates or lobbyists on the County's campaign finance law is necessary, nor does the County believe the level of enforcement is inappropriate.

RECOMMENDATIONS

The 2015/2016 San Diego County Grand Jury recommends that the San Diego County Board of Supervisors:

16-65: Provide campaign law training and education for elected officials, candidates and lobbyists for the County of San Diego, possibly by adding these training and education duties to an existing county department.

Response: This recommendation will be partially implemented. The County periodically provides trainings to elected county officials and their staff on numerous topics. The County is currently updating the materials that will be presented to elected county officials and their staff and it will include the County's local campaign finance law. The Registrar of Voters will continue to coordinate training for candidates and campaign treasurers provided by representatives from the Fair Political Practices Commission. The County does not believe a separate training on the County's campaign finance law is necessary. The County will not provide campaign law training to lobbyists because the County ordinance regulating lobbyists is straightforward and it prohibits candidates or office holders from accepting campaign donations from a lobbyist registered to lobby that office. The County is not aware of instances in which the County's campaign laws have not been appropriately enforced.

**COUNTY OF SAN DIEGO RESPONSE TO 2015-16 GRAND JURY REPORT
"Mental Health Services Act in San Diego County"
Filed June 9, 2016**

FINDINGS

Finding 01: HHSA has substantial funds available to expand services.

Response: The Chief Administrative Officer disagrees partially with this finding. Mental Health Service Act (MHSA) funds are volatile and can fluctuate significantly from year to year; therefore the County of San Diego's Health and Human Services Agency (HHSA) maintains a long-range operational planning perspective and approach to ensure continuity of services in the allocation of these dollars. Since Fiscal Year 2004-05, HHSA has spent over 78% of its allocated MHSA funds. While HHSA does not have substantial funds available to expand services, HHSA has proposed a fiscally prudent expansion of services in Fiscal Year 2016-17.

Finding 02: While legally allowable within the ambiguous language of MHSA, some MHSA-Funded programs are not consistent with the stated purpose of MHSA to serve the seriously mentally ill.

Response: The Chief Administrative Officer disagrees wholly with this finding. MHSA mandates that counties establish Prevention and Early Intervention (PEI) programs that emphasize strategies to reduce the following negative outcomes that may result from untreated mental illness: 1) suicide, 2) incarcerations, 3) school failure or dropout, 4) unemployment, 5) prolonged suffering, 6) homelessness, and

7) removal of children from their homes. Also, applicable State regulations regarding PEI state that prevention programs may include universal prevention, which is defined as for individuals and members of groups or populations whose risk of developing a serious mental illness is greater than average. Additionally, State regulations require that Innovation programs be vetted and approved by the MHSA Oversight and Accountability Committee (MHSAOAC) prior to implementation. The MHSA PEI and Innovation programs listed in the Grand Jury report all work toward preventing one or more of the negative outcomes listed above and are consistent with MHSA and regulations pertaining to allowable programs.

Finding 03: Building on HHSA's collaborative efforts, streamlining the innovation cycle would benefit the county's seriously mentally ill and at-risk population.

Response: The Chief Administrative Officer disagrees partially with this finding. The County's population of persons at risk of or with a serious mental illness would benefit from a streamlined innovation cycle. However, State regulations prescribe the method for the development of new Innovation programs and require approval from the State before implementation can begin. These factors impact the timeframes for development of new programs through the approval process and are outside of the County's control.

Finding 04: Providing incentives and opportunities earlier in students' education could increase and diversify the pool of potential mental health professionals in the county.

Response: The Chief Administrative Officer agrees with this finding.

RECOMMENDATIONS

The 2015/2016 San Diego County Grand Jury recommends the San Diego County Board of Supervisors and the County of San Diego's Health and Human Services Agency:

16-66: Appropriate a larger percentage of MHSA funds each year in order to improve services to a larger number of seriously mentally ill and at-risk county residents.

Response: The recommendation has been implemented.

The MHSA Fiscal Year 2016-17 Annual Update has increased estimated spending for Fiscal Year 2016-17 by \$54 million from what was originally proposed in the Three Year Plan. It should be noted that the MHSA Three Year Program and Expenditure Plan's budget is an estimate of expenditures and revenues for the plan components. Actual expenditures and revenues will vary from the plan, resulting in changes to the final unspent amounts as well as component ratios and these changes are reflected in subsequent annual updates.

MHSA annual allocations of funds are volatile and can fluctuate significantly from year to year; therefore, HHSA maintains a long-range operational planning perspective and approach to ensure continuity of services in the allocation of these dollars. Additionally, unspent MHSA dollars related to the time required to start-up newly funded or enhanced programs due to the procurement process and typical program start-up activities contributes to the size of the MHSA account.

16-67: Focus MHSA funds more narrowly on services to the seriously mentally ill and at-risk population.

Response: The recommendation will not be implemented because it is not warranted.

MHSA requires that 80% of funds be allocated for Community Services and Supports (treatment) programs for persons with serious mental illness and their family members. MHSA also mandates that 20% of funds be allocated for Prevention and Early Intervention (PEI) programs that are likely to bring about positive mental health outcomes either for individuals and families with or at risk of serious mental illness, or for the mental health system.

PEI programs that serve parents, caregivers, or family members, meet the requirements of MHSA since they are designed to reduce risk factors for developing a serious mental illness, and build protective factors for children or youth at risk of or with early onset of a mental illness,. Examples of risk factors for serious mental illness includes adverse childhood experiences, experience of severe trauma, family conflict or domestic violence, or having a family member with serious mental illness.

MHSA also mandates that each county implement stigma and discrimination reduction programs. Per State regulations, these programs can include activities to reduce negative feelings, attitudes, beliefs, perceptions, stereotypes and/or discrimination related to being diagnosed with a mental illness, and efforts to combat multiple stigmas that have been shown to discourage individuals from seeking mental health services. Stigma and discrimination reduction programs bring mental health awareness into the lives of all members of the community through public education initiatives and include efforts to encourage self-acceptance for individuals with a mental illness so that they are more likely to seek mental health services.

Recognizing the potential for co-occurring mental illness and substance use disorders, PEI funds may also be used to provide mental health screenings at substance abuse treatment programs in an effort to increase access to needed care. Through PEI, mental health becomes part of wellness for individuals and the community, reducing the potential for stigma and discrimination against individuals with mental illness.

Additionally, because counties are mandated to receive State approval for Innovation funded programs prior to implementation, all current Innovation programs, including the mobile hoarding program, were vetted and approved by the MHSOAC and, therefore, deemed appropriate.

16-68: Shorten the innovation process in order to spend more MHSA Innovation funds creatively.

Response: The recommendation will not be implemented because it is not reasonable.

Funds for Innovation programs are set aside from the Community Services and Supports allocation as permitted by MHSA to support novel, creative and/or ingenious mental health practices and approaches expected to contribute to learning for the mental health field.

Regulations require counties to develop Innovation programs after undergoing a community program planning process, involving planning sessions and meetings, to engage diverse stakeholders for their input. Once counties draft Innovation programs from the community input obtained, regulations also require counties to circulate to stakeholders the proposed programs for review and comment for at least 30 days. When finalized, counties then obtain approval from their board of supervisors before submitting their new Innovation program to MHSOAC. MHSA requires newly developed Innovation programs to be reviewed and approved by the MHSOAC prior to implementation of programs and expenditure of Innovation funds. The County of San Diego does not have control over the length of time it will take to receive final approval from the MHSOAC. Moreover, because the County contracts for services, it would not be prudent to complete a competitive solicitation process prior to receiving final approval from the MHSOAC for an Innovation program.

While these requirements may lengthen time to implementation of an Innovation program, ultimately careful consideration of the needs of stakeholders and completion of the full planning and approval processes allows counties the opportunity to evaluate new approaches that can inform current and future mental health practices.

16-69: Collaborate with high schools and community colleges to expose students to mental health careers through stipends, internships, work-study or other opportunities.

Response: The recommendation has been implemented. Workforce Education and Training (WET) under MHSA is designed to promote educational opportunities and create an entry point of employment for students interested in working in the behavioral health services field and was identified in MHSA to fund programs for a limited period of 10 years. Focus is placed on educational certificate programs for peers and at the community college level allowing students to gain an understanding of the field and obtain entry level jobs. A current program is the "Public Mental Health Work Certificate of Achievement Program" at San Diego City College. HHS previously funded the "School Based Pathways Academy" at the Health Sciences High and Middle College. The program was such a success that the high school decided to continue the program after WET funding ended.

**COUNTY OF SAN DIEGO RESPONSE TO 2015-16 GRAND JURY REPORT
"Long Term Psychiatric Beds in San Diego County"
Filed June 9, 2016**

FINDINGS

Finding 01: The County of San Diego needs more long-term psychiatric treatment beds.

Response: The Chief Administrative Officer disagrees partially with this finding.

The County of San Diego's Health and Human Services Agency (HHS) reviews Long Term Care (LTC) capacity, gaps and needs on an annual basis. The total local Institute for Mental Disease (IMD) bed capacity for San Diego County is 157 in-county beds and 10 out-of-county beds for a total of 167 beds. The in-county beds include 75 beds contracted with Alpine Special Treatment Center (ASTC), and 82 beds with Crestwood Behavioral Health, Inc. (divided among their San Diego and Chula Vista sites).

The County also contracts with skilled nursing facilities (SNF) to provide daily and "patch" rates for an additional 59+ beds for Fiscal Year 2015-2016. This brings the total long-term psychiatric care beds BHS contracts for to 226. SNF contracts include beds for those with brain injuries and severe neurocognitive impairment (NCI). Current plans for long term care expansion is focused on increasing SNF/STP (Special Treatment Program) beds and long term care outpatient step-down capacity, such as Full Service Partnership/Assertive Community Treatment services to address gaps in this level of care.

Finding 02: The County has underutilized resources for psychiatric beds.

Response: The Chief Administrative Officer wholly disagrees with this finding.

The County has appropriately utilized its resources for psychiatric beds. Also, Mental Health Services Act (MHSA) funding is generally not available for involuntary treatment facilities due to funding restrictions contained in State law. In reference to the space within the San Diego County Psychiatric Hospital (CMH), analysis regarding use of the space is currently in development.

Finding 03: San Diego County has resources for establishing much needed Step-Down Facilities.

Response: The Chief Administrative Officer agrees with this finding.

The County currently contracts with the following 16 facilities designed to be step-down programs for those discharging from IMDs:

CRF Casa Pacifica in Oceanside;

- Changing Options in Ramona;
- Twelve (12) Augmented Services Programs throughout the County, including two that are designed for Older Adults; and
- Two (2) Anne Sippi Clinic locations (located Bakersfield and Los Angeles).

Additional IMD step-down facilities are planned for Fiscal Year 2016-2017 contingent on funding availability.

RECOMMENDATIONS

The 2015/ 2016 San Diego County Grand Jury recommends that San Diego County Behavioral Health Services:

16-70: Revise the contract with Alpine Special Treatment Center (ASTC) to increase the number of long term care beds available to San Diego County residents.

Response: The recommendation will not be implemented because it is not reasonable. The total number of beds that ASTC is licensed for is 113 beds. San Diego County contracts for 75 of those beds. The remaining beds are currently contracted with Los Angeles County or used for commercial insurance, private pay or other payers. Additionally, the County has added 82 local IMD beds in the last two fiscal years with Crestwood Behavioral Health, Inc. to address gaps.

The current Long Term Care system needs analysis shows that San Diego County's long term care capacity would benefit from adding SNF/STP beds. Funding has been identified for San Diego County to add additional STP beds in Fiscal Year 2016-2017. San Diego County also added 15 SNF beds for neurocognitive impairment (NCI) and brain injuries in Fiscal Year 2015-2016, further adding to long term care capacity for San Diego County residents.

16-71: Explore options for the closed wing at CMH to provide more long term psychiatric beds.

Response: The recommendation requires further analysis.

Plans for the future use of space within the San Diego County Psychiatric Hospital (CMH) are currently in development and the initial analysis will be completed by December 7, 2016.

16-72: Explore options using MHSA resources to support the establishment of Step-Down facilities for patients leaving long term treatment centers.

Response: The recommendation has been implemented. As stated in response to Finding 03, BHS currently contracts with 16 facilities designed to be step-down programs for those discharging from IMDs (receives MHSA funding). Plans to add additional IMD step-down facilities are being developed and are dependent on available funding.
