



County of Orange  
 Health Care Agency, Behavioral Health Services  
 MHA Office  
 405 W. 5<sup>th</sup> St. Suite 354  
 Santa Ana, CA 92701



Phone: (714) 834-3104 E-mail: [mhsa@ochca.com](mailto:mhsa@ochca.com)

**Mental Health Services Act (MHA)**

**30-Day Public Comment Form – Examining Whether Integrating Early Intervention Services into a Specialized Court Improves the Well-Being of Justice-Involved Young Men: A Randomized Controlled Trial**

**PERSONAL INFORMATION**

<b>Name</b>			
<b>Agency/Organization</b>			
<b>Phone number</b>		<b>E-mail</b>	
<b>Mailing address (street)</b>			
<b>City, State, Zip</b>			

**MY ROLE IN THE MENTAL HEALTH SYSTEM**

<input checked="" type="checkbox"/>	Person in recovery	<input type="checkbox"/>	Probation
<input type="checkbox"/>	Family member	<input type="checkbox"/>	Education
<input type="checkbox"/>	Service provider	<input type="checkbox"/>	Social Services
<input type="checkbox"/>	Law enforcement/criminal justice	<input type="checkbox"/>	Other (please state)

**COMMENTS**

This is the second of two MHA Innovations projects under current 30-day public comment that could not be more different. This project is the more admirable of the two. This Young Adult Court project originates from the rigor of a National Institute of Justice (NIJ) grant that required a strong experimental design. This project comes to MHA with the prerequisites for publishable results: a Randomized Controlled Design, strong human subject research outcomes tracking, and an Institutional Review Board. Publishable results can convince other jurisdictions, Health Insurance Companies, the Justice Community and healthcare professionals that developmentally appropriate consequences result in better outcomes for young men with still-developing brains.

Although the MHA General Requirement and Primary Purpose for this project do not include the goal of improved quality or better outcomes, this project is designed to show possible improved quality or possible better outcomes. The grantwriters acknowledge that this project is experimental. All participants, both Justice Professionals and Justice Involved Youth are provided informed consent that describe the risks and benefits for participation in this research.

It is my hope that both the Orange County Supervisors and the Mental Health Services Oversight and Accountability Commission approve this project. It is my hope that in about 5 years the Justice Professionals involved in this project will publish their outcomes, building a coalition to change how judicial consequences are delivered to those with still-developing brains.



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WELLNESS • RECOVERY • RESILIENCE

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**Mental Health Services Act**

**30-Day Public Comment Form**

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**MY ROLE IN THE MENTAL HEALTH SYSTEM**

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<input type="checkbox"/>	<b>Law enforcement/criminal justice</b>	<input type="checkbox"/>	<b>Other (please state)</b>

**COMMENTS**

**Examining Whether Integrating Early Intervention Services into a Specialized Court Improves the Well-Being of Justice-Involved Young Adult Men: A Randomized Controlled Trial**

“Mental health practices or approaches that have already demonstrated effectiveness are only eligible with an adaptation and rationale for the adaptation.”

There has already been the exact same project with evaluation that has been completed by:

- California Judicial Council
- California Association of Youth Courts
- Baltimore City Teen Court Evaluation
- San Diego Teen Court
- And several others

**From:**  
**To:**  
**Cc:**  
**Subject:**  
**Date:**

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**From:**  
**Sent:** Tuesday, March 22, 2022 11:30 AM  
**To:** MHSA <mhsa@ochca.com>  
**Subject:** Regarding Orange County Young Adult Court

I am a retired police officer who has engaged in this very topic for some years. Very excited to see this evidence come forward in this fashion. Based on my experience, training, and studies I think this is a big step in the right direction.

I am excited to follow this project and the published results.

As far as I can see, you have studied the topic and researched it in all the ways I thought possible. I commend you and support you. I have nothing more to add. I wish you the best of luck.

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**Mental Health Services Act (MHSA)**

**30-Day Public Comment Form – Improving the Early Identification of Youth at Clinical High Risk for Psychosis and Increasing Access to Care**

**PERSONAL INFORMATION**

Name			
Agency/Organization			
Phone number		E-mail	
Mailing address (street)			
City, State, Zip		CA	

**MY ROLE IN THE MENTAL HEALTH SYSTEM**

<input checked="" type="checkbox"/>	Person in recovery	<input type="checkbox"/>	Probation
<input type="checkbox"/>	Family member	<input type="checkbox"/>	Education
<input type="checkbox"/>	Service provider	<input type="checkbox"/>	Social Services
<input type="checkbox"/>	Law enforcement/criminal justice	<input type="checkbox"/>	Other (please state)

**COMMENTS**

This is one of two MHSA Innovation projects under current 30-day public comment that could not be more different. This Early Psychosis project is the disappointing of the two projects. Originating within the Orange County MHSA community, this project is not structured to produce actionable nor publishable outcomes. An existing intervention, Youth Nominated Support Teams (YNST) is being applied in a novel way to patients experiencing a different mental health diagnosis. Right now we don't know that YNST will prevent Early Psychosis or reduce sequelae experienced by those with Clinical High Risk. Because this project lacks an experimental design it will be impossible to show that interventions in this project result in better outcomes. Thus an opportunity to show other jurisdictions, Health Insurance Companies, Healthcare Professionals, Police Officers and the general public that YNST could possibly work is missed. Note that the stated goals of 1) Makes a Change to an Existing Practice in the field of Mental Health; and 2) Increases access to mental health services to underserved groups; do not include showing better outcomes. This is a weakness in the MHSA law.

Of great concern is the lack of informed consent and Institutional Review Board support. The grantwriters for this project exude extreme confidence that YNST already works on the Clinical High Risk population. This has yet to be shown. This project lacks the experimental design and strong Human Subject outcomes tracking to validate efficacy. Yet, this project will train clinicians and the general public as if YNST do work for better outcomes. This is greatly concerning because the most basic and longstanding standards for Human Subject Research are not met. People experiencing mental illness and their families deserve the same Human Subject Research protections as any other human.



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**Mental Health Services Act**

**30-Day Public Comment Form**

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<input type="checkbox"/>	Law enforcement/criminal justice	<input type="checkbox"/>	Other (please specify)

**COMMENTS**

In reviewing the proposal for early identification of youth at high risk of psychosis it should be noted that there are a number of methodologies, resources, and upstream programs focused on the issue of early identification of mental distress, including psychosis.

In the past 2 years, a number of behavioral health programs and screening tools have been implemented or expanded by stakeholders in Orange County including Western Youth Services (ACES screening), UCI, in school mental health resource centers, provider & family education programs offered through NAMI and other organizations.

Early screening is critical and yet this is barely addressed in this proposal. This is a critical requirement in any effort to identify at risk individuals. Numerous early screening modalities are available and should be front and center of any effort to improve early identification of psychosis.

There are 400,000 students in our public schools and another 20,000 in Diocesan and other schools in Orange County. In order to have an impact screening is critical to success. Then, where do the resources come from?

We need better coordination and collaboration and resources should be directed towards increasing the availability of current screening and services.



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**Mental Health Services Act (MHA)**

**30-Day Public Comment Form – Orange County Innovation Community Program  
 Planning Proposal**

**PERSONAL INFORMATION**

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**COMMENTS**

Developing Innovative mental health projects is difficult. It takes much thought to design a project that shows evidence of better outcomes believable by healthcare providers, Health Insurance Companies, Police, First Responders, Government Officials and the General Public. Conducting literature reviews of the published knowledge takes time, but is required to understand any MHA Innovation project. Some people are willing to invest the time, others take an attitude of “less is more.” Funding an Innovation project is not enough. We must understand what we are funding to determine if it would change the thinking of healthcare providers, Health Insurance Companies, Police, First Responders, Government Officials and the General Public.

It is our hope that this funding would be inclusive of peers with interest in MHA Innovation projects. It is our hope that the Orange County Board of Supervisors and Mental Health Services Oversight and Accountability Commission (MHSOAC) approve this project.