

DATE:

TO: Supervisor David Canepa, President
Supervisor Don Horsley, Vice-President
Supervisor Carole Groom
Supervisor David Pine
Supervisor Warren Slocum

FROM: The San Mateo Mental Health & Substance Abuse Recovery Commission,
Sheila Brar, Chair

SUBJECT: Crisis Response Coordination Recommendations

CONTEXT

In fulfillment of our roles as advocates, we are respectfully submitting this overview and related recommendations to the San Mateo County Board of Supervisors based on 1) extensive community feedback shared directly with us, 2) research conducted by our Police / Mental Health Partnership Ad Hoc Committee, and 3) our lived experiences as consumers, family members, and advocates.

As stated in Welfare and Institutions Code Section 5604.2, the duties of the San Mateo County Mental Health & Substance Abuse Recovery Commission include, but are not limited to, the following:

- ***Review and evaluate** the community's mental health needs, services, facilities, and special problems.*
- ***Advise the Board of Supervisors** and the local mental health director as to any aspect of the local mental health program.*

BACKGROUND:

In January 2020 at our Commission annual retreat one of the priorities we set was to have a more active role in advocating to the "rightsizing" of police and mental health calls for service. We realized that the police were overburdened with mental health calls for service and, in some cases, not the right response. We understood that the County had adequate crisis services, but not fully integrated into the 911 system to be able to respond to mental health calls for service.

As we set out on our journey to build on our own experiences with input from the community, we did not predict the extent of national civil unrest that would come this year as well as local

events involving police and the mentally ill. We, as a Commission, heard the call for reform on police response to mental health calls. We also learned that a pilot program between cities was in the works. The Commission established an Ad Hoc committee to provide input and be a resource for this pilot program. After several attempts to be involved in the formation of the pilot program we learned that the cities had already established the framework for the program. One City Manager even stated at a public meeting that the Commission on mental health had no input into the planning of a mental health partnership.

Refocusing our efforts to our county wide clients, we decided the Ad Hoc should focus on services County wide, and not limit our group to the four cities in the pilot program.

People with serious and untreated mental health and substance use conditions often encounter barriers that prevent receiving the right services. The absence of appropriate services causes many harms including mental health and substance use crises. Unfortunately, we do not have appropriate systems in place to respond to mental health and substance use crises.

As a result, persons experiencing mental health or substance use crisis may:

- end up in confrontations with law enforcement personnel which have tragic outcomes;
- be transported to emergency rooms and be admitted or committed to inpatient psychiatric facilities when these outcomes are unnecessary and may be harmful to the person; and
- be transported to a jail and subjected to ongoing involvement in the criminal justice system when these outcomes are unnecessary, are harmful to the person and do not lead to increased public safety.

People with serious and untreated mental health and substance use conditions often encounter barriers that prevent receiving the right services. Police officers, behavioral health providers, and community stakeholders face challenges in determining and implementing the proper ways to intervene during behavioral health crisis. Unfortunately, as a result, interactions with people with mental illness in crisis often result in actions that significantly hurt recovery. For example, in 2016, a quarter of all fatal police shooting nationwide involved people with behavioral health or substance use conditions.¹

Many of the problems associated with police involvement in behavioral health crises can be avoided by creating alternatives. Non-behavioral medical emergencies, such as heart attacks, strokes and non-vehicular accidents are often handled by the 911 system. But rather than dispatching a police officer, an ambulance is sent. A law enforcement response to a mental health crisis is almost always stigmatizing for people with mental illnesses and should be avoided when

¹ Tate, J., Jenkins, J., & Rich, S. (2016). Fatal force 963 people have been shot and killed by police in 2016. *Washington Post*. <https://www.washingtonpost.com/graphics/national/police-shootings-2016/> and <https://store.samhsa.gov/shin/content/SMA14-4848/SMA14-4848.pdf>

possible. Whenever possible, mental health crises should be treated using medical personnel or, even better, specialized mental health personnel. Substance use disorders need to be handled in a way that promotes recovery, not victimization.²

“The history of negative interactions between police officers and mentally ill individuals hits close to home, and some experts say the risk is even higher for mentally ill people of color”³ Family members and other loved ones are also impacted by traumatic police responses to mental health crises, and these traumatic interactions also affect larger communities.

Experience with or knowledge of others’ traumatic encounters with law enforcement during mental health crises may leave family members feeling unsafe and cause them to avoid calling 911 during subsequent crises. Since there are few other options during a crisis, people and their families are left with unmet needs.⁴

This letter is our request on behalf of those we represent, the community leaders, and families we’ve engaged over the last several months. Here are the Ad Hoc actions that inform this letter:

- _Collected and reviewed public comments from family members and clients on mental-health, crisis-related interactions with law enforcement
- _Researched and reviewed Crisis Intervention Training (CIT), PERT, and alternative crisis response programs
- _Engaged with and/or heard presentations from:

San Mateo County Crisis Services
NAMI San Mateo
San Mateo County Dispatch
San Mateo County PERT & CIT
ACLU MidPen
Democracy for America, Social Justice Task Force
San Mateo Democrat Central Committee, Police Reform Task Force

RECOMMENDATIONS:

² <https://store.samhsa.gov/shin/content/SMA14-4848/SMA14-4848.pdf>

³ Caiola, Sammy. “Should Police Be Responding To Mental Health Calls? This Group Says No, And Offers An Alternative.” Capradio, Sacramento, 16 June 2020. <https://www.capradio.org/articles/2020/06/16/should-police-be-responding-to-mental-health-calls-this-group-says-no-and-offers-an-alternative/>

⁴ Torres, Stacy. “Why we won’t call 911: Too Often Police Officers’ Response to Mental Illness is Deadly.” CalMatters, 13 October 2019. <https://calmatters.org/commentary/crisis-intervention-training/>

Recommendation #1 Adding “Mental Health” to dispatcher protocols

The Mental Health crisis in this County goes far beyond law enforcement. Perhaps no group in this country has been tasked to manage and interact with the mentally ill more than our police and sheriff. One study shows that almost half the people killed by police had a mental illness.⁵ Another study determined that the mentally ill are 16 times more likely to be killed in America than someone without a mental illness.⁶

Our current emergency telephone system or 911 must be updated and overhauled to reflect complicated mental health concerns.

Our recommendation is to add a criterion in the protocol for dispatchers answering 911 calls for service. We recommend adding “Mental Health” to the 911 answering protocol. Dispatcher should now ask, “911, do you need police, fire, EMS or mental health services.”

These policy amendments should also address when it is appropriate to connect callers who do not need a police response to more appropriate services, such as EMS, PERT, or the imbedded clinician (see recommendation #2) at the appropriate time.

We also recommend taking a look inside 911 call centers, how they code and dispatch calls, and how to divert on the same or compatible platforms. Dr. Rebecca Neusteter, executive director at University of Chicago’s Health Lab and former policing program director at the Vera Institute of Justice reported that 911 call classification codes are both over- and under-specific.⁷ In New York, she worked in a jurisdiction with 150 call-taking codes where the most frequently used code was “other.” When she and her former colleagues at the Vera Institute of Justice did a multicity 911 analysis evaluating call code inter-rater reliability, they found that two call takers weren’t likely to classify calls the same way. “In most cases, the call codes didn’t match up,” she said.

In Atlanta, Dr. Shila Hawk and Dr. Kevin Baldwin at Applied Research Services, Inc., analyzed 3.5 million 911 calls in the city’s metropolitan area and found that roughly 600,000 calls (18.4%) may have been suitable for diversion from 911. These calls were commonly logged as “suspicious person,” “criminal trespass,” or “street/sidewalk hazard.”

Like many call centers, the dispatch process is reminiscent of the children’s game Telephone. The caller says their reason for calling, the call taker tells the dispatcher, and then the dispatcher tells the officers what the caller said. In many jurisdictions, points out Dr. Neusteter, a third person is in the mix. “There’s often an operator who determines if the call requires police, fire, or EMS,”

⁵ https://www.salon.com/2012/12/10/half_of_people_shot_by_police_are_mentally_ill_investigation_finds/

⁶ <https://www.usatoday.com/story/news/2015/12/10/people-mental-illness-16-times-more-likely-killed-police/77059710/>

⁷ <https://talk.crisisnow.com/the-troubling-history-of-911-and-how-988-can-avoid-the-same-missteps/>

she says. “They then transfer to the call taker who inputs the notes that a dispatcher intercepts to deploy resources and connect with responders through Computer Aided Dispatch and/or the radio.”

In November, 2014, in Cleveland Ohio, a caller tells the 911 call taker that there is a youth with a gun pointing it at people. He says the person on the swing is “probably a juvenile” three separate times and points out at least twice that the “gun may be fake.” The dispatcher tells the responding officers of the “black male,” pointing a gun at people. The dispatcher never mentions that the subject may be a child playing with a fake gun.⁸

Within two seconds of police arrival 12 year old Tamir Rice was shot and died the next day. There was no indication in the call takers notes clarifying the details of the youth or a possible fake gun. Since the dispatcher did not have those notes, they could not pass that information along to responding officers. “Police radio personnel errors were a substantial contributing factor to the tragic outcome.” “Had the officers been aware of those qualifiers, the training officer who was driving might have approached the scene with less urgency and lives may not have been put at stake.”⁹

Often 911 call classification codes are both over- and under-specific. For instance, call takers and responders may have hundreds of codes to choose from to classify a call, yet the system doesn’t adequately allow for nuance and detail. 911 systems need a method for first responders — including mobile crisis teams — and service providers to update details in the systems, code the call correctly, and add mental health codes to reflect the true nature of the call. This will allow call centers to provide better care and services to the person and to retool the system to truly understand people’s needs.

Recommendation #2 Mental Health Integrated Dispatch

Serving as the first contact a person makes when calling 911 for a crisis, the dispatch center is a vital triage point. There are critical times when behavioral health elements may not be understood by the call taker or passed along to responding officers. There are also times when a law enforcement response may not be the most appropriate response for the person calling 911.

A trained licensed professional play an invaluable role in triaging these needs, ensuring assignment to the most appropriate resources available, and supporting the officer with all necessary and available details while he or she is on scene. This clinician will also be able to triage the calls to ensure the proper response to the situation, hence being able to send a “clinician only” response to a call that is deemed safe and conversely send a police response when deemed an unknown or unsafe situation.

⁸ https://www.washingtonpost.com/video/national/audio-from-the-tamir-rice-shooting/2014/11/26/8389ceda-75bb-11e4-8893-97bf0c02cc5f_video.html

⁹ <http://prosecutor.cuyahogacounty.us/en-US/SYN/68177/NewsDetailTemplate.aspx>

Houston Police Department and the Harris Center initiated a collaborative Crisis Call Diversion (CCD) program in 2015 and, since that time, the program has demonstrated strong efficacy in diverting non-emergent CIT calls away from police and EMS to CCD clinicians embedded in the call center. The clinicians, who are employed by the Harris Center, link the caller to needed services rather than dispatching a police unit or ambulance to the scene. The CCD program has provided cost savings, and, more importantly, significant cost avoidance to Houston first responder agencies. Initial research estimated the program provided Houston agencies with over \$1.3 million in cost avoidance netting first responder agencies over \$860,000 in cost savings in the first year of operations¹⁰ while connecting thousands of Houston area residents to mental health care services during times of crisis.

If a similar program were developed in San Mateo County, we recommend collaboration with BHRS to place clinicians directly on the dispatch floor as an integrated component of 911 operations. Implementation and program design should reflect the needs of San Mateo County and consider modifications, including participating at an earlier triage point with call takers, ability to divert calls to the most appropriate resources such as PERT or EMS, as well as providing support and appropriate information to officers on scene.

The Call Center Clinicians should hold Criminal Justice Information Systems (CJIS) clearance and complete call taker training to allow them to enter information directly into the Computer Automated Dispatch (CAD) system and communicate directly with the officer on scene; however, these clinicians should not be placed in a primary call answering or dispatch position. The clinician position should be developed in such a way that its function serves as a support and add-on service to any 911 call taker or dispatcher handling a call with a suspected or confirmed behavioral health crisis element. The clinician should have access to (BHRS SYSTEM?) and data systems while in the call center, and policies should support the sharing of necessary information with police as well as EMS to reduce the risk of escalation and poor outcomes for crisis calls for service. Lastly, upon implementation of recommendation #1 the call center should immediately transfer any mental health 911 call to a 911 call taker who has completed and demonstrated competency in mental health training for call takers, adding on the clinician when available.

LA County is proposing a true regional crisis call center network, with shared standards for triage, the ability to dispatch non-law enforcement crisis response teams, and a shared view into available crisis stabilization resources with an overall goal of minimizing law enforcement response to the maximum extent possible. They are considering a reconfigured and appropriately resourced 911 call center network integrated with the behavioral health crisis call center network as one means for all calls to be taken directly and functioning as a regional network to screen, triage, and dispatch crisis calls to a non-law enforcement response at every possible opportunity and law enforcement co-response teams where indicated. A reconfigured 911 call center network would include a re-branding media campaign through a lens of racial equity and in consideration of the communities' current perception of 911.

¹⁰ <https://www.houstoncit.org/ccd/>

In terms of this network and its inclusion of 911, it should be noted that other jurisdictions, such as Houston, have 911 networks that are not led by law enforcement and have standard protocols for when to triage a call to law enforcement. This so called “opt-in” framework, whereby the default response is non-law enforcement unless explicitly determined to require law enforcement response during triage, stands in stark contrast to the current “opt-out” framework, where law enforcement response is the default unless otherwise indicated. Preliminary data from Houston shows 51% reduced overall dispatches, 50% reduced time for dispatched professionals in the field, and ~\$6:1 ROI. The “opt-in” framework is a model that LA County needs to explore to allow for health and lived experience professionals to facilitate crisis triage options.¹¹

Recommendation #3 Stand Alone Crisis Services / County Wide PERT

A review of evaluations of co-responder models in the United States, Canada, and Australia concluded that the model demonstrates the potential to offer increased access to community-based mental health treatment and reduce the burden on police officers (e.g., decreasing officer time required on a mental health crisis call). However, studies have found that officers do not perceive the co-responder model as more efficient than standard department response. Further, staffing for this model can be problematic because there are few mental health workers available outside of normal business hours, limiting the availability of the mobile crisis team.¹²

In this review, they identified three major limitations of the current evidence for co-response triage, a) the lack of information on the characteristics of service users b) the lack of detail when describing co-response models and the variation in their operationalization and, c) the lack of rigorous comparative research on effectiveness.¹³

There remains a lack of evidence to evaluate the effectiveness of street triage and the characteristics, experience, and outcomes of service users. There is also wide variation in the implementation of the co-response model, with differences in hours of operation, staffing, and consistency of incident response.¹⁴

There were differences in times and days of operation, whether the unit was a first or second-response option, whether the police officer and mental health worker were co-located, whether a mobile unit was dispatched or not, and the mode of transportation to the incident (marked or unmarked vehicles). There was also limited, if any, information on other mental health provision in the study area. While co-responder models have recently received much attention, they are not a panacea but rather one component of a larger crisis response system.¹⁵

¹¹ <http://file.lacounty.gov/SDSInter/bos/supdocs/149254.pdf>

¹² <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6094921/>

¹³ ID

¹⁴ <https://bmcp psychiatry.biomedcentral.com/articles/10.1186/s12888-018-1836-2>

¹⁵ <https://www.nasmhpd.org/sites/default/files/2020paper11.pdf>

Given the considerable recent investment of resources by police and mental health services, thoughtful evaluation of triage services should lead development of models rather than be left as an afterthought. Rigorous data on outcomes, both immediate and long-term, following a triage intervention is needed. We also need further exploration of service users and their carers' experience of triage, and their participation in the design of these services. Finally, we need to move towards better model description and evaluation, with the aim of creating fidelity indicators linked to good practice and good outcomes.

San Mateo County should create a stand-alone crisis unit designed to independently operate mobile crisis response teams to service the entire county. The crisis unit's comprehensive integrated system of services should be accessible to anyone, anywhere, and anytime, providing a "No Wrong Door" safety net services approach. The crisis unit shall be a one-stop hub that provides a continuum of care across its clinical and non-clinical wraparound services to ensure stabilization from a crisis, access to treatment, clinical follow-up care, and linkages to ongoing preventive and support services that are established in San Mateo County.

In 2016, the Action Alliance's Crisis Services Task Force published a groundbreaking report¹⁶ on crisis mental healthcare services. The report states that most community-based mobile crisis programs have teams made up of professional and paraprofessional staff. For example, the team might include a clinician and a peer support specialist, with back-up from psychiatrists or clinicians. It stated that the peer support team member often takes the lead when engaging with a person in crisis.¹⁷

Last year, SAMHSA (Substance Abuse & Mental Health Services Administration) published National guidelines that further flesh out what a mobile crisis team should include. It states that for safety and optimal engagement, two people should make up a team. Teams must comprise "a licensed and/or credentialed clinician" who can assess people's needs within the region where the service operates and incorporate peer support and lived experience specialist.

The SAMHSA recommendations also included 24/7 crisis call centers that can provide immediate support over the phone and connect callers to community resources.

In San Mateo County, cities that are not a part of the Community Wellness Crisis Response Pilot have no alternative other than dialing 911, or have established their own Crisis Response Unit. A mental health crisis scene is often in flux and unpredictable. Without standardized practices, crisis teams respond in highly variable ways. That creates tremendous variability from whether they're willing to go out on a call to how they react on the scene. The service people receive will differ depending on who shows up. You may have teams that are skittish and others that entirely ignore the risks. When mobile crisis dispatch is inconsistent, "officers will stop calling," said Nick Margiotta, a retired Phoenix police officer and president of Crisis System Solutions "For law enforcement to outreach mobile crisis services, they need to be able to depend on a consistent rapid response 24/7."

¹⁶ <https://theactionalliance.org/sites/default/files/inline-files/CrisisNow%5B1%5D.pdf>

¹⁷ <https://talk.crisisnow.com/preston-looper-on-how-its-time-to-standardize-mobile-crisis-services/>

The crisis unit breaks the cycle of disconnected services, lack of consistent follow-up with someone from initial contact or release from an institution, and unnecessary 5150 initiations and ED visits due to lack of alternatives. The crisis unit could be a separate entity to PERT, or fully integrated into the PERT program and operate as a county wide PERT/ Crisis Response Unit. Its multidisciplinary teams will collaborate with city police and the Sheriff's Office.

With a crisis unit functioning in the county, residents would have the option of requesting police, fire, EMS, or Mental Health Services upon activation of the 911 system, as well as a clinician in dispatch to immediately triage the call. Furthermore, when a dedicated non-911 number (such as 988) is implemented, the call could route directly to the crisis unit.

CLOSING:

In the fall of 2020, Congress passed the National Suicide Hotline Designation Act¹⁸ creating a nationwide number, 988, for mental health and suicidal crises. The FCC has acted to make 988 available in every community by July 2022.

The upcoming rollout of 988 means that we have the opportunity to push for not only crisis call centers, or expanding existing services (such as embedded clinicians in dispatch) but the other components of a crisis response system (stand-alone crisis teams or county wide PERT services.) The argument for making these changes now is simple: when someone dials 911 or 988, we need to make sure appropriate mental health services are available to respond to a range of crises.

Currently, very few communities offer anything close to the standard of care for these services. Without adequate crisis response services, communities are left to depend on law enforcement and emergency departments that are ill-equipped to help someone experiencing a mental health crisis.

Making sure there is a range of services to help anyone in crisis, no matter where they live in San Mateo County, will help ensure no one in a mental health crisis fall through the cracks.

“Most calls that go through 911 don’t require a law enforcement response and can be transferred to a crisis line where we know the majority of calls, 80% and upward, are resolved at that level, and there’s no need for police involvement.”¹⁹

¹⁸ <https://www.congress.gov/bill/116th-congress/senate-bill/2661/text>

¹⁹ <https://talk.crisisnow.com/mental-health-care-shouldnt-come-in-a-police-car/>

ADDITIONAL REFERENCES:

“Cops, Clinicians, or Both? Collaborative Approaches to Responding to Behavioral Health Emergencies”

<https://www.nasmhpd.org/sites/default/files/2020paper11.pdf>

“Roadmap to the Ideal Crisis System;” https://www.thenationalcouncil.org/wp-content/uploads/2021/03/031121_GAP_Crisis-Report_Final.pdf?dof=375&eTbd56

“Reengineering LA County’s Crisis Systems;”

<https://talk.crisisnow.com/reengineering-la-countys-crisis-systems/>

“National Guidelines for Behavioral Health Crisis Care;”

<https://www.samhsa.gov/sites/default/files/national-guidelines-for-behavioral-health-crisis-care-02242020.pdf>

“Crisis Now;” <https://theactionalliance.org/sites/default/files/inline-files/CrisisNow%5B1%5D.pdf>

“Care First Jails Last;”

https://ceo.lacounty.gov/wp-content/uploads/2020/10/1077045_AlternativestoIncarcerationWorkGroupFinalReport.pdf

“Defunding the police and people with mental illness; ”<http://www.bazelon.org/wp-content/uploads/2020/08/Defunding-the-Police-and-People-with-MI-81020.pdf>

“AB 988;” https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB988