

Proposition 64 Cohort 3 Grant Program

Local Evaluation Plan

Title of Project:

County of Santa Barbara

Submitted by (Name of grantee):

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Prepared by:

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Date:

September 28, 2023

Project Period:

May 1, 2023 – April 30, 2028

Project Background

The Santa Barbara Sheriff's Office (SBSO) Cannabis Compliance Team is using Prop. 64 grant funding to increase staffing to its licensing and compliance function. SBSO is in the process of hiring two additional detective positions to assist with processing the current licensing backlog and accomplish the large task of completing quarterly compliance checks of licensed operators. Creating a robust, comprehensive compliance program will aid in the prevention and protection of the public from dangers affecting safety such as crime associated with the illegal market and underage access. Prior to the grant project start date, the Cannabis Compliance Team consisted of five detectives with three focused on enforcement and two focused on compliance and licensing. Due to Santa Barbara County's cannabis program size and scope, that level of personnel assigned to the team was not able to effectively and efficiently provide the attention needed to all the different aspects of the Cannabis Program (*enforcement, compliance, licensing, and administrative work*). With new operators coming on board and getting licensed and the current illegal market for cannabis in Santa Barbara County thriving, the workload continues to increase. The addition of the two detective positions will augment the existing Cannabis Compliance Team to distribute the workload and provide the necessary oversight to the cannabis operators within the county more effectively.

Specifically, for the licensing team to be effective, consistent resources must be dedicated to accomplishing a myriad of tasks. These tasks fall within the licensing responsibilities for the team and involve an active role in the land use entitlement process, business license review, and representing the county on administrative appeals and litigation as subject matter experts or witnesses. There is also a considerable demand to complete a license review correctly the first time, per county code. Projects may not be changed or altered (*by the Planning and Development agency*) following an appeal. As a result, there is a need for consistent and dedicated staffing who know and understand the process; we need to get it done right the first time. This licensing need highlights a need for continued compliance checks of the licensed businesses which include cultivation sites, retail store front businesses and non-retail delivery services. Although currently there are only 52 fully licensed operators in the county, and about 12 more that are operating on provisional state licenses alone, there is a need to provide oversight and accountability. Prior to this grant funding, compliance checks were not completed on a regular basis because of the lack of staffing and resources.

Proposition 64 (Cohort 3) Grant Program

The funding allocated to SBSO will fund 2.0 full-time Sheriff's Detectives that will enhance the licensing and compliance efforts that are currently bogging down the two assigned detectives. With the addition of the new detectives, the Cannabis Compliance Team will have more time to assist operators complete the application process and operate successfully within the confines of the existing state and local laws. The expansion will also have an immediate impact by reducing the large and unmanageable case load that the two current detectives are sharing. It will also allow the team to start conducting comprehensive and consistent compliance checks of the fully licensed businesses. This will bring much needed oversight and accountability to the cannabis industry in Santa Barbara County. Funding from this grant will address the following goals and objectives:

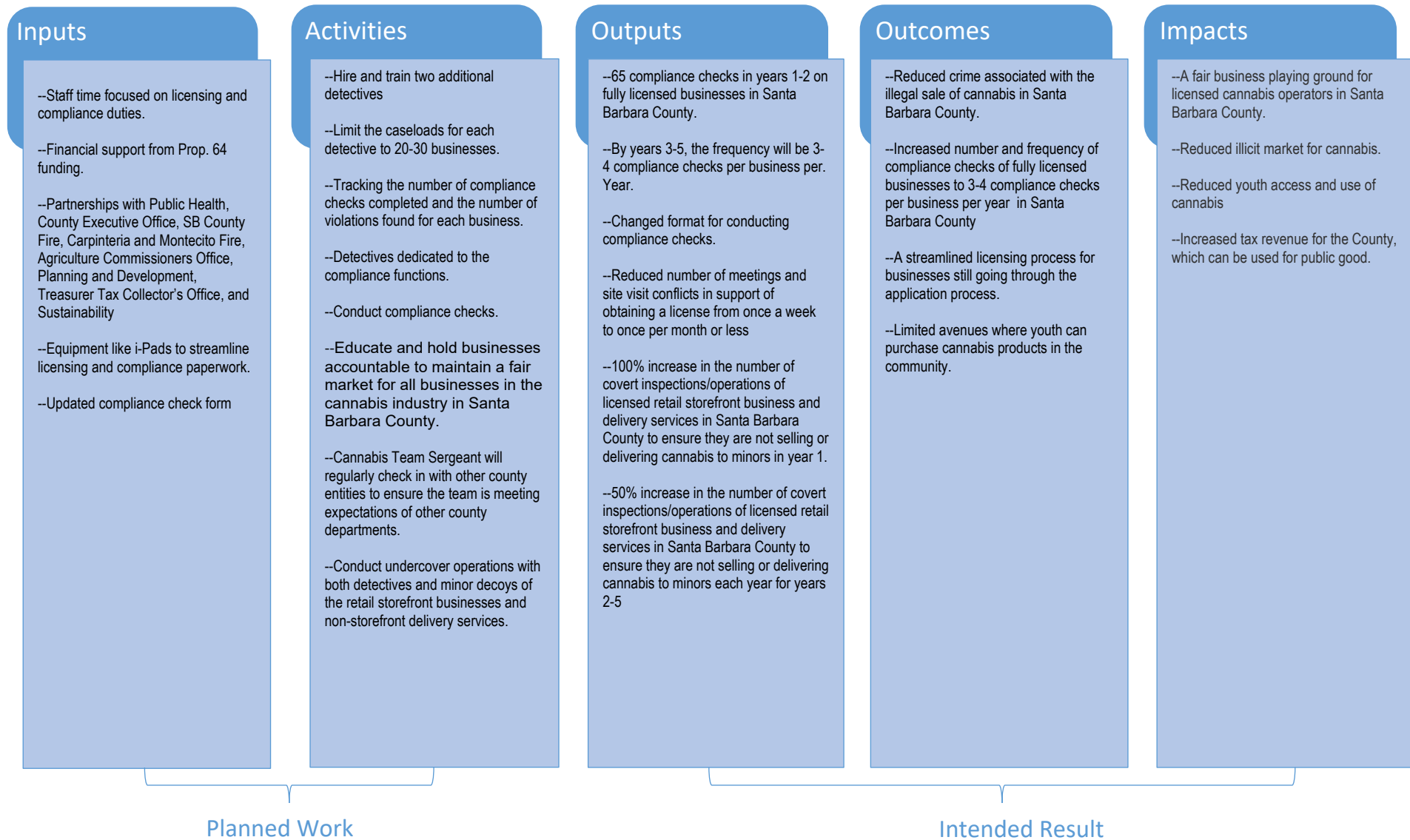
- **Goal 1:** To reduce crime associated with the illegal sale of cannabis in Santa Barbara County through enhanced compliance check of the legal cannabis business.
 - **Objective 1A:** To reduce the circumstance that legally grown cannabis can be diverted to the illicit market through increased staffing, thus giving the detective time to conduct compliance checks on the fully licensed businesses in Santa Barbara county confirming plants are weighed properly.
- **Goal 2:** Increase the number of comprehensive and frequent compliance checks of fully licensed cannabis businesses in the county.
 - **Objective 2A:** Change the format of conducting compliance checks on fully licensed businesses from whenever the two licensing/compliance detectives have time between licensing duties to having dedicated detectives to the compliance functions at a rate 3-4 times per business per year.
 - **Objective 2B:** Educate and hold businesses accountable to maintain a fair market for all businesses in the cannabis industry in Santa Barbara County.
 - **Objective 2C:** Combat cannabis product being diverted to the illicit market through frequent and comprehensive license checks.
- **Goal 3:** Streamline the licensing process for businesses still going through the application process.
 - **Objective 3A:** Limit the number of meetings and site visit conflicts to allow for a more streamlined process for the applicant that reduces the amount of time from initial application to licensing.
 - **Objective 3B:** Increase the availability of licensing and compliance detectives to the businesses and other county departments involved in the licensing process and reduce the amount of time it takes to complete the process.
- **Goal 4:** Limit the avenues where youth can purchase cannabis products in the county.

Proposition 64 (Cohort 3) Grant Program

- Objective 4A: Conduct covert inspections/operations of licensed retail store front businesses and delivery services in Santa Barbara County to ensure they are not selling/delivering cannabis to minors.

Please note that some of the goals and objectives were reworded from the original grant submission to reduce prior redundancy and to streamline. The revised goals and objectives were submitted to BSCC for approval on September 13, 2023 via email.

Project Logic Model



Process Evaluation Method and Design

The process evaluation of the Santa Barbara County grant will address the quantity and quality of the activities being provided to increase oversight of the legal cannabis business in Santa Barbara County through licensing and compliance duties. The process evaluation will use quantitative and qualitative data to provide a descriptive study of how the inputs and activities are working towards achieving the goals and objectives of the grant. The external evaluator has developed Baseline Data form to collect pre-grant data that will be used to compare to quarterly data collected on the activities and outputs throughout the grant project period. As part of the evaluation activities, the evaluator is developing a Quarterly Evaluation Report form that will be completed by Cannabis Compliance Sergeant and supplied to the evaluator for tracking and data analysis. The overall decision-making for the project lies with the Cannabis Compliance Sergeant and he will work with his administrative support to gather the data from the various record keeping databases used by the Sheriff's Office to complete the Quarterly Evaluation Report form. The external evaluator will track the data provided in an Excel spreadsheet to graph and will use SPSS to analyze the quantitative data with descriptive statistics. Chi-square tests can be used to assess for statistically significant change over time.

As documented in Table 1, the quantity of inputs and activities will be tracked such as the hiring of the two additional detectives in order to have staff time devoted to licensing and compliance activities, the number of license applications processed, the number of compliance checks conducted, and the number of covert operations conducted. Pre-grant baseline data for each indicator and then quarterly data during the grant period will be graphed to visually display progress on these indicators and the percent increase from baseline will be calculated to document oversight success. One indicator of quality of activities is the average caseload for detectives, in order to ensure they have time to devote to licensure applicants and to conduct regular compliance checks and another is average wait time from application to licensure. Not all of wait time is under the control of the Cannabis Compliance team, but they can monitor their contribution to that to note any trends or areas for improvement. The quality of oversight activities is measured by the percent increase in compliance checks over baseline, number and percent increase in covert investigations, and the number and percent of violations remedied. As noted earlier, all this data will be graphed quarterly to visually display trends, and reviewed with the Cannabis Compliance team to help promote continuous program improvement. For documenting systems improvement in how the Santa Barbara County Sheriff's Office partners with the broader county cannabis compliance efforts, the external evaluator will interview the Cannabis Compliance Sergeant annually to document improvements and setbacks that have occurred over the year, how they are being

Proposition 64 (Cohort 3) Grant Program

addressed, and goals for the upcoming year. A Table will be developed to visually highlight the changes that occurred each year of the grant project to be included in the Local Evaluation Report.

Table 1. Process Evaluation Data Matrix for Santa Barbara County Prop. 64 Grant

Input/Resource/Activity/Output	Data Element(s)	Data Source(s)	Frequency of Data Collection
Increased staff time on licensing and compliance checks through the hiring of two additional detectives.	# of detectives hired and then maintaining 4 detectives on the compliance team	Staffing report from Cannabis Compliance Sergeant	Quarterly until hired, then annually to monitor maintenance of staffing
	# of licenses processed	Quarterly Evaluation Report form completed by Cannabis Compliance Sergeant	Quarterly
Limiting the caseloads for each detective to 20-30 businesses	Average caseload for detectives	Caseload report for each detective supplied by Cannabis Compliance Sergeant	Quarterly through the duration of the grant period.
	Average wait time from application to licensure	Quarterly Evaluation Report form completed by Cannabis Compliance Sergeant	
Conduct 65 compliance checks annually, increasing to 3-4 compliance checks per business per year by the end of the grant period.	# of compliance checks conducted and percent increase over baseline and annually	Quarterly Evaluation Report form completed by Cannabis Compliance Sergeant	Data will be monitored quarterly for trends and compared to the baseline pre-grant period
	Average # of compliance checks conducted per business		

Proposition 64 (Cohort 3) Grant Program

Education and accountability of businesses with violations	# of violations because education and accountability will be provided for each violation # and % of violations remedied	Quarterly Evaluation Report form completed by Cannabis Compliance Sergeant	Data will be monitored quarterly for trends and compared to the baseline pre-grant period
Track the number of cases generated from the compliance checks	# of cases and % change in cases overtime	Quarterly Evaluation Report form completed by Cannabis Compliance Sergeant	Data will be monitored quarterly for trends and compared to the baseline pre-grant period
Develop a streamlined process for dealing with violations observed	Time from application to license	Annual item on the Quarterly Evaluation Report form completed by Cannabis Compliance Sergeant	Annually from the County Executive Office
Partnership with the broader County Cannabis Compliance Team	Documentation of systems improvement efforts to facilitate stronger partnerships	Interview with Cannabis Compliance Sergeant	Annual interview by external evaluator
Conduct covert inspections and operations of licensed retail storefront businesses and delivery services	# of covert inspections completed and percent increase over baseline and annually	Quarterly Evaluation Report form completed by Cannabis Compliance Sergeant	This will be calculated for an annual period and compared to baseline pre-grant period, but the question item will be collected quarterly throughout the grant period.

Outcome Evaluation Method and Design

The outcome evaluation is centered around addressing if the grant activities proposed (1) reduces crime associated with the illegal sale of cannabis? (2) how does the rate of compliance checks affect outcomes?; (3) lead to a streamlined licensing process for businesses?; and (4) do covert operations reduce youth access to cannabis products? The outcomes for the Santa Barbara County Prop. 64 grant are displayed in **Table 2**. There is some overlap between the process evaluation data collection and the outcome evaluation in terms of monitoring the increased number of compliance checks, which is the central focus of this project. We will address changes made by this grant project by comparing data collected during the grant period to the pre-grant baseline data for each outcome. This repeated-measures quantitative design allows us to serve as our own control from which to measure change due to the grant activities. A limitation of this design is that for some of the outcomes, such as reduced crime associated with the illegal cannabis trade and limiting avenues where youth can purchase cannabis products, many other factors can influence change in these outcomes beyond the activities in this grant. Indeed, there are many other county partners also working on addressing these issues. We can document our contribution to any change (through the efforts at increasing compliance checks, covert operations, and streamlining the licensing process), but other factors affect crime rate and youth cannabis use. In sum, we cannot determine a causal influence on these factors, but can provide data on our contribution to any changes in these outcomes.

The external evaluator has developed Baseline Data form to collect pre-grant data that will be used to compare to quarterly data collected on the activities and outputs throughout the grant project period. As part of the evaluation activities, the evaluator is developing a Quarterly Evaluation Report form that will be completed by Cannabis Compliance Sergeant and supplied to the evaluator for tracking and data analysis. The overall decision-making for the project lies with the Cannabis Compliance Sergeant and he will work with his administrative support to gather the data from the various record keeping databases used by the Sheriff's Office to complete the Quarterly Evaluation Report form. The external evaluator will track the data provided in an Excel spreadsheet to graph and will use SPSS to analyze the quantitative data with descriptive statistics. Chi-square tests can be used to assess for statistically significant change over time. We have the capacity to do more sophisticated analyses, if needed or requested.

Table 2. Outcome Evaluation Matrix for Santa Barbara County

Outcome	Definition	Data Source(s)	Frequency of Data Collection
Reduced crime associated with the illegal sale of cannabis in Santa Barbara County.	Crime reporting codes for illegal sale and distribution of cannabis.	This involves tracking the following codes annually compared to the 2 years prior to the grant: <ul style="list-style-type: none"> • Health and Safety Code section 11358- Illegal Cultivation of marijuana (more than 6 plants) • Health and Safety Code section 11359- Possession of cannabis for sale • Health and Safety Code section 11360- Illegal transportation of marijuana 	This will be collected annually every April 30 th .
Increased number and frequency of compliance checks.	Number of Compliance Inspection Reports completed and number of compliance checks per site.	Quarterly Evaluation Report Form	Quarterly.
A streamlined licensing process for businesses still going through the application process.	The time from the date of application to the date of license received	Data from the County Executive Office	This will be collected annually every April 30 th .

Limited avenues where youth can purchase cannabis products in the community.	# and % increase in covert operations with minor decoys conducted on retail cannabis businesses and delivery services	Quarterly Evaluation Report Form	Quarterly.
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