

# American Psychiatric Association

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July 10, 2014

The Honorable Sloan Gibson  
Acting Secretary  
United States Department of Veterans Affairs  
810 Vermont Avenue, N.W.  
Washington, DC 20420

Re: RIN [2900-AO71](#); Proposed Rule: Health Care for Homeless Veterans Program; Vol. 79, No. 94 Federal Register 27826 (May 15, 2014)

Dear Secretary Gibson,

I write on behalf of the American Psychiatric Association (APA), the medical specialty association representing over 35,000 psychiatric physicians and their patients and families, to express our opinion on the Department of Veterans Affairs (VA) proposed rule to change the eligibility criteria for the Health Care for Homeless Veterans (HCHV) Program. Under current regulations, only veterans who are homeless, enrolled in the VA health care system or eligible for VA health care, *and* have a serious mental illness and/or substance use disorder (SUD) are eligible for the program. In accordance with statutory changes, the VA is proposing to eliminate the requirement that homeless veterans have a serious mental illness or substance use disorder to participate in the program.

The VA also states in the proposed rule that the requirement that veterans be diagnosed with a serious mental illness and/or SUD can sometimes result in the individual not seeking treatment or refusing services through this program to address the issue of homelessness. The VA estimates that 85% of the veterans who are homeless also have a serious mental illness and/or SUD, but that the 15% who do not are not well served by this program. APA agrees with the VA that many veterans likely do not seek services for their homelessness through this program due to the requirement that they be diagnosed with a serious mental illness or SUD and we support this proposed change as it will result in more homeless veterans, both with and without serious mental illness or SUD, receiving services in the VA system.

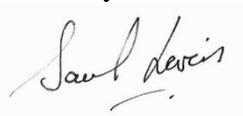
However, we would like to express our concerns about how the newly changed program will be administered. We have concerns about the VA's ability to adequately fund the HCHV program. The proposed regulatory change could have a large impact on the number of veterans who apply for assistance from this program and this could overburden the system. To ensure our veterans receive sufficient resources, we urge the VA to request increased funding and resources to accommodate the number of new



enrollees. Furthermore, APA has concerns that it may have the unintended result of disadvantaging homeless veterans with a serious mental illness/SUD if the veterans without such diagnoses are easier to place or receive the bulk of the services available. APA cautions the VA that, even with the proposed change, the focus should be on the vast majority of homeless veterans who do have a serious mental illness/SUD and are in the greatest need of VA services.

Thank you again for this opportunity to submit comments on this proposed regulatory change. We look forward to working with the VA on future modifications to the HCHV program and providing these important services for homeless veterans. If you have any questions, concerns or would like to discuss this further, please contact Lizbet Boroughs in our Department of Government Relations at (703) 907-7800.

Sincerely,

A handwritten signature in black ink that reads "Saul Levin". The signature is written in a cursive style with a horizontal line under the name.

Saul M. Levin, M.D., MPA  
CEO & Medical Director