

February 19, 2019

The Honorable Seema Verma
Administrator
U.S. Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Dear Administrator Verma:

The undersigned applaud the Centers for Medicare & Medicaid Services (CMS) for its work in offering States new tools to combat the opioid crisis. The undersigned request that CMS examine an additional area of potential new state tools through a Request for Information (RFI) in its next Notice of Proposed Rulemaking: mental health, substance use, and related services provided in and coordinated with schools and early education programs.

As CMS acknowledged in its recent Maternal Opioid Misuse (MOM) model and Integrated Care for Kids (InCK) models, the toll on children will continue to grow as the opioid epidemic rages on. Schools and early education programs are critical settings for supporting children and their families as communities deal with the opioid crisis, but relatively few schools have been able to offer a coordinated response as they struggle to sustain services that are otherwise eligible for CMS reimbursement. The recent CMS guidance on Opportunities to Design Innovative Service Delivery Systems for Adults with a Serious Mental Illness or Children with a Serious Emotional Disturbance offered important encouragement for states in offering school-based services, and we believe that additional guidance or small regulatory changes may better equip states with everything they need to leverage schools and early education programs in their opioid strategy.

Additional CMS support would also enhance implementation of H.R. 6, the Substance Use–Disorder Prevention that Promotes Opioid Recovery and Treatment (SUPPORT) for Patients and Communities Act. The SUPPORT for Patients and Communities Act contained a number of provisions aimed at improving school-based strategies for addressing the opioid epidemic, including policies on telehealth in schools, loan repayment for those providing behavioral health services in schools, and grants to support evidence-based behavioral health programs in schools. CMS can reinforce these provisions by examining how current policies could better support states in offering school-based behavioral health services.

Because the opportunities and challenges facing each state are different, the undersigned recommend that CMS issue an RFI in its next Notice of Proposed Rulemaking, seeking information about CMS policy barriers and opportunities for states and communities in using schools and early education programs to:

- Address the mental health and substance use needs and risks of students;
- Coordinate other health care services in schools;
- Support adults instrumental to the behavioral health of the children;
- Engage multiple health care payers, as well as relevant state and local agencies; and
- Mitigate any potential for waste, fraud, and abuse.

The undersigned thank CMS for its consideration and look forward to continued partnership with the Administration in combatting the nation's opioid epidemic.

Sincerely,

Mental Health America
AASA, The School Superintendents Association

American Art Therapy Association.
American Association for Marriage and Family Therapy
American Association for Psychoanalysis in Clinical Social Work
American Dance Therapy Association
American Occupational Therapy Association
American Physical Therapy Association
American Psychiatric Association
American Psychological Association
American Speech-Language-Hearing Association
Association of Maternal & Child Health Programs
Association of School Business Officials International (ASBO)
Campaign for Trauma Informed Policy and Practice
Children and Adults with Attention-Deficit Hyperactivity Disorder
Children's Defense Fund
Children's Hospital Association
Council for Exceptional Children
Council on Social Work Education
Eating Disorders Coalition
Family Voices
First Focus on Children
Florida Chapter of the American Academy of Pediatrics
Global Alliance for Behavioral Health and Social Justice
Healthy Schools Campaign
International OCD Foundation
National Alliance on Mental Illness
National Alliance to Advance Adolescent Health
National Association for Children's Behavioral Health
National Association for State Mental Health Program Directors
National Association of Councils on Developmental Disabilities
National Association of School Psychologists
National Association of Secondary School Principals
National Association of Social Workers
National Eating Disorders Association
National Education Association
National Federation of Families for Children's Mental Health
National Hispanic Medical Association
Sandy Hook Promise
School-Based Health Alliance
School Social Workers Association
The Kennedy Forum
The Trevor Project
Tourette Association of America
Treatment Communities of America
Trust for America's Health