

May 23, 2023

The Honorable Michael Bennet
United States Senate
261 Russell Senate Office Building
Washington, D.C. 20510

The Honorable Ron Wyden
United States Senate
221 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Senators Bennet and Wyden,

We write as organizations committed to improving the lives of individuals with mental health conditions and substance use disorders (MH/SUD) to express our strong support for the Better Mental Health Care for Americans Act. This legislation is a critical step towards ensuring equitable access to MH/SUD care and addressing the country's growing mental health and substance use crisis.

The Better Mental Health Care for Americans Act contains numerous powerful provisions that would improve access to services for millions of Americans. Our organizations enthusiastically support your efforts to expand the Mental Health Parity and Addiction Equity Act's (MHPAEA) protections to Medicare Advantage, Medicare Part D, and all of Medicaid. The lack of parity protections in Medicare and Medicaid leaves tens of millions of people – including older adults, individuals with disabilities (including MH/SUDs), and lower-income individuals – without the fundamental right to non-discriminatory MH/SUD coverage. Ensuring MH/SUD coverage parity in these programs will significantly reduce the barriers to care that millions of Americans face.

We also strongly support provisions that will improve the accuracy of provider directories for Medicare Advantage plans. Inaccuracies are extraordinarily commonplace, with a 2018 study by the Centers for Medicare & Medicaid (CMS) found that 52 percent Medicare Advantage provider locations in directories contained at least one inaccuracy.¹ Inaccurate directories and so-called “ghost networks” hinder access to care, causing far too many individuals to face barriers in connecting to a provider at the very beginning of trying to find help. This is especially problematic for people experiencing symptoms of MH/SUDs, which may make reaching out for help and calling long lists of unavailable providers particularly difficult. This contributes to long delays in getting needed MH/SUD care.

¹ Centers for Medicare & Medicaid Services, “Online Provider Directory Review Report,” 2018, https://www.cms.gov/Medicare/Health-Plans/ManagedCareMarketing/Downloads/Provider_Directory_Review_Industry_Report_Year2_Final_1-19-18.pdf.

Our organizations are also grateful for provisions in your legislation that address the longstanding problems of inadequate reimbursement rates for MH/SUD services in Medicare and Medicaid, including for integrated services. Ending discriminatory reimbursement of MH/SUD services is an essential step towards fixing our MH/SUD system. Medicare, in particular, plays a central role in determining MH/SUD reimbursement throughout our entire health care system. Therefore, discriminatory rates in this program create an inequitable framework that is largely copied by other payers.

We are firmly committed to integrated MH/SUD care in primary care as studies have conclusively demonstrated the effectiveness of this setting for the delivery and coordination of services. However, financial barriers of low rates and cost-sharing are preventing this systemic change in primary care. Your legislation would increase reimbursement for integrated behavioral health services and address cost-sharing barriers that prevent the scaling of integrated care.

Our organizations strongly support the establishment of a Medicaid demonstration project to increase access to integrated mental health care for children in settings like schools, pediatric primary care practices and community organizations. Mental health challenges among youth have been on the rise, with the U.S. Surgeon General and leading children's health care groups sounding the alarm.^{2,3} It is critical that our nation provide timely mental health services in settings that are convenient to youth and their families, especially those in underserved and rural communities.

Finally, we support the requirement for CMS to align payments, measure access and quality, improve prevention services for mental health care and bring together payers to transform behavioral health within primary care. These efforts will help ensure that our nation's healthcare system is better equipped to address the growing mental health crisis and provide quality care to those in need.

We thank you for your leadership on this critical issue and look forward to working with you to advance the Better Mental Health Care for Americans Act to improve the lives of millions of Americans with mental health conditions and substance use disorders.

Sincerely,

The Kennedy Forum
Mental Health America
National Alliance on Mental Illness

² U.S. Surgeon General, U.S. Department of Health and Human Services, "Protecting Youth Mental Health: The U.S. Surgeon General's Advisory." 2021. <https://www.hhs.gov/sites/default/files/surgeon-general-youth-mental-health-advisory.pdf>.

³ American Academy of Pediatrics, American Academy of Child & Adolescent Psychiatry, and Children's Hospital Association. "AAP-AACAP-CHA Declaration of a National Emergency in Child and Adolescent Mental Health." 2021. <https://www.aap.org/en/advocacy/child-and-adolescent-healthy-mental-development/aap-aacap-cha-declaration-of-a-national-emergency-in-child-and-adolescent-mental-health>.

American Art Therapy Association
American Association for Marriage and Family Therapy
American Association of Child and Adolescent Psychiatry
American Association of Nurse Anesthesiology
American Association of Psychiatric Pharmacists (AAPP)
American Association on Health and Disability
American Counseling Association
American Foundation for Suicide Prevention
American Psychiatric Association
American Psychological Association
American Society of Addiction Medicine
Anxiety and Depression Association of America
Children and Adults with Attention-Deficit/Hyperactivity Disorder
Children's Hospital Association
Clinical Social Work Association
Crisis Text Line
Depression and Bipolar Support Alliance
Eating Disorders Coalition for Research, Policy, & Action
Employee Assistance Professionals Association
Inseparable
International OCD Foundation
International Society for Psychiatric Nurses
Lakeshore Foundation
Legal Action Center
Maternal Mental Health Leadership Alliance
NAADAC, the Association for Addiction Professionals
National Association for Rural Mental Health
National Association of County Behavioral Health and Developmental Disability Directors
National Association of Social Workers (NASW)
National Association of State Mental Health Program Directors
National Council for Mental Wellbeing
National Eating Disorders Association
National Federation of Families
NHMH - No Health w/o Mental Health
Policy Center for Maternal Mental Health
Postpartum Support International
Psychotherapy Action Network
REDC Consortium
RI International
SMART Recovery
The National Alliance to Advance Adolescent Health
Trust for America's Health
Vibrant Emotional Health