



March 14, 2022

The Honorable Xavier Becerra
Secretary
U.S. Department of Health and Human Services
200 Independence Ave SW
Washington, DC 20201

Dear Secretary Becerra,

On behalf of the National Association of Counties (NACo) and the National Association of County Behavioral Health and Disability Directors (NACBHDD), which represent the nation's 3,069 counties, parishes and boroughs and the behavioral health service providers that they employ, we write to express our gratitude for the release of President Biden's [Strategy to Address Our National Mental Health Crisis](#). **Our organizations particularly support your efforts to conduct listening sessions to gather more information on how to best implement this strategy and respectfully urge you to include and consult county officials and behavioral health and disability directors during this endeavor.**

Counties are integral to the nation's behavioral health system, as both fiscal contributors and coordinators of behavioral health services within county-owned and operated community health facilities. Through 750 behavioral health authorities and community providers, counties plan and operate community-based services for individuals with mental illnesses and substance use conditions. In nearly every state and the District of Columbia, there is at least one mental health facility operated by a county, local or municipal government. Additionally, counties help finance and administer Medicaid services, the largest source of funding for behavioral health services in the United States. By directing resources to community-based treatment and services, counties can better serve residents with behavioral health conditions, reduce reliance on the criminal legal system and direct valuable resources towards improving stability and health.

The details of president's mental health strategy parallel that of county behavioral health priorities, which emphasize the need for greater access to and availability of county behavioral health services. Specifically, we applaud the inclusion of new funding in the president's Fiscal Year (FY) 2023 budget request that would bolster the behavioral health workforce and staff local crisis centers in support of the launch of the national 988 crisis response line. Other areas of alignment with county priorities in the national strategy include funding community mental health centers and Certified Community Behavioral Health Centers (CCBHCs), enhancing funding for mental health and substance use treatment integration with primary care, proposing that health plans cover three behavioral health visit each year without cost-sharing, increasing access to tele- and virtual mental health care, improving access to mental health services for vulnerable populations including veterans and students, and addressing the youth mental health crisis.

As the administration works to further develop and implement this strategy, our organizations offer the following policy recommendations to further enhance behavioral health care access and availability in counties:

- **Increase integration, coordination and access to care** by removing exclusion policies that create barriers to treatment services such as the Medicaid Institutions for Mental Diseases (IMD) exclusion and Medicaid Inmate Exclusion Policy (MIEP). Additionally, ensure barriers to Medication Assisted Treatment (MAT) for opioid use disorders are removed from Medicaid policies.
- **Improve reimbursement mechanisms and finance behavioral health care enhancements** through sustained Medicaid funding for outpatient mental health services, specifically related to the development of local crisis response infrastructures.
- **Support rural counties who face unique challenges** in sustaining access to prevention, treatment, and recovery-oriented services, including crisis response, and recruiting, training, and sustaining a sufficient workforce.

Counties are committed to a strong intergovernmental partnership to advance policies that provide the resources needed to address the long-term behavioral and mental health needs of our residents.

On behalf of the NACo and NACBHDD membership, we stand ready to work with you to advance the components of this strategy and would appreciate the time to meet with you during the national listening tour to further discuss how we can partner on improving increase equitable access to behavioral health services.

If you have any questions, please feel free to contact Blaire Bryant, NACo Associate Legislative Director, at bbryant@naco.org or at 202.942.4246.

Sincerely,



Matthew Chase,
CEO/Executive Director
National Association of Counties



Jonah Cunningham
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