



Minnesota Association of Community Mental Health Programs

Representative Peter Fischer, Chair
Human Services Policy Committee
Minnesota House of Representatives
March 8, 2023

Dear Chair Fischer and Committee Members

On behalf of the Minnesota Association of Community Mental Health Programs (MACMHP), I am sending this letter to support House File 2553 – mental health regulations streamlining and administrative simplification.

The Minnesota Association of Community Mental Health Programs (MACMHP) is the state's leading association for Community Mental Health Programs, representing 35 community-based mental health providers and agencies across the state. Our mission is to serve all who come to us seeking mental and chemical health services, regardless of their insurance status, ability to pay or where they live. As Essential Community Providers, we serve primarily culturally diverse, low-income, uninsured and public healthcare program insured Minnesotans, who cannot access services elsewhere. We serve our clients with comprehensive and coordinated care.

We appreciate all your work on Mental Health Uniform Service Standards (USS), recognizing the current mental health regulatory system needs to change. We are continuing to build on the good work USS started with HF 2553. Many parts of our current mental health regulatory system still have in place very rigid and complicated processes providers and clients have to navigate to access care. Many regulatory processes, service requirements, forms and assessments had been codified in law, with little to no ability adjust with changing practices, new care models or responding to the workforce environment. This all severely limits clients and communities ability to access care to critical mental health and SUD care and treatment.

Our community mental health providers have to spend too many hours tracking, interpreting confusing regulations, and following up with regulatory agencies when they conflict. Clients are required to answer multiple assessment questions (some as long as three hours at a time and taking six months to complete) before providers are allowed to offer care/ services. All the time spent on all these activities is time not delivering high quality mental health services to clients.

HF 2553 is taking next steps in removing these barriers to care and services by:

removing duplicative training requirements, adding flexibility to regulatory requirements allowing providers to respond in the current environment, eliminating unnecessary assessing/ surveying of clients, adding flexibility to staffing requirements for programs to respond to the workforce shortage, setting standard foundational certification criteria across mental health programs, opening up access to peers services, streamlining data reporting requirements, setting standard expectations for MCO claims filing and prior authorizations – consistent with Medicaid FFS.

We thank the Committee for hearing this bill. Regulatory details and processes are not the most exciting of legislative reforms, but they truly impact the experience of Minnesotans navigating the mental health service system. We ask for your support of HF 2553.

Sincerely

Jin Lee Palen, Executive Director
Minnesota Association of Community Mental Health Programs | MACMHP