



To: Human Services Policy Committee; Senate Conferees Hoffman, Mann, and Utke;
House Conferees Fischer, Frederick, and Baker
From: Brian Zirbes, MARRCH Executive Director
Subject: MARRCH letter of support for SF4399-2nd Engrossment
Date: May 1st, 2024

We are writing to express our gratitude to the authors for MARRCH’s policy proposals in the Senate (Abeler, Hoffman, and Maye Quade) and House (Frederick, Baker, and Fischer). We also want to extend our gratitude to committee staff and members of the Human Services Policy committees for supporting these bills. We request the following language from SF4399-2nd engrossment be adopted in Conference Committee:

- Section 1—adding ‘or master’s degree’ to 148F
 - Support Senate language
- Section 10—eliminating licensing candidates from ratio:
 - Support House and Senate identical language
- Section 15 and 16—Behavioral Health Fund affidavit and span of eligibility timelines reduced
 - Support House and Senate identical language
- Section 18—Changes in 254B include reducing hours for medical enhancement from 2 to 1; changing the co-occurring enhancement from employing 25% of counseling staff to ‘employ a mental health professional;’ residential documentation changes allowing billing at the provided level if a clients hours are low but the program is trying to get them engaged; and allowing hours in a treatment week to be reduced in observance of a federal holiday
 - Support Senate language.
 - Also support the language in the House that re-adds high, medium, and low intensity along with extended timelines for ASAM. **Do not lose the changes in 254B in the senate language. See note of concern in section 20 below.**
- Section 22—Provider Payment Rates
 - Support the DHS amendment that would allow 3.1 providers that provide 15 hours or more to continue to get the medium intensity rate. Also allows 3.1 providers that provide between 5-14 hours to be paid at the low intensity rate.

- Section 23—Paperwork Reduction report released by December 2024.
 - Support House and Senate identical language

Concern:

- Section 20—making changes to hours requirements for ASAM Levels of Care. Without rates to support basic delivery of service, these changes should be contingent upon implementation of SUD rates recommended by Burnes & Associates. The Legislature and Governor’s office cannot continue to burden SUD programs with unfunded mandates.
 - No New Regs Without Relief!
 - Support DHS amendment to eliminate Section 26; Level of care requirement.

We appreciate the opportunity to work with DHS and bill authors on the other sections of this bill that address Peer Recovery Support, Opioid Treatment Programs, Opioid educational materials, and Comprehensive Assessment timelines. These important policy changes will result in clients getting access to services sooner and reduce many administrative barriers for programs and professionals.

As previously noted, the data on overdose deaths is at an all time high, there have been a **net reduction in 45 SUD programs** in 2022 and 2023 (over 40% of those closures were in Greater MN; 6 of them were programs that treated adolescents). According to a MARRCH member survey of over 620 SUD workers, stress and burnout are significantly impacting our workforce.

As legislators work toward the end of Session, we plead that you consider making meaningful steps to shore up SUD programs for the next year. We look forward to the continued involvement and support of SUD policy and payment to help Minnesota take care of those most in need of accessible and effective treatment options.