



BEHAVIORAL HEALTH

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Board Administration
Behavioral Health Center
201 Mulholland
Bay City, MI 48708
800-448-5498 Access Center
989-895-2300 Business

Arenac Center
PO Box 1188
1000 W. Cedar
Standish, MI 48658

North Bay
1961 E. Parish Road
Kawkawlin, MI 48631

William B. Cammin Clinic
1010 N. Madison
Bay City, MI 48708

Wirt Building
909 Washington Ave.
Bay City, MI 48708

www.babha.org

June 17, 2021

Representative Bronna Kahle, Chairperson
MI House Health Policy Committee
P.O. Box 30014
Lansing, MI 48909-7514

Dear Chairperson Kahle:

The purpose of this correspondence is to provide written testimony to the Health Policy Committee concerning proposed House Bills 4925, 4926, 4927, 4928 and 4929.

Bay-Arenac Behavioral Health Authority (BABHA) is a multi-county Community Mental Health Services Program (CMHSP) serving residents of Bay and Arenac Counties. BABHA provided specialized mental health services and supports to nearly 4500 persons with serious mental health and intellectual/developmental disabilities in 2020.

The public mental health system in Michigan is based on the Federal Community Mental Health Centers Act of 1963 and grounded in the Michigan Mental Health Code, Public Act 258 of 1974. This created a state and county partnership for community mental health safety net services and ensures that related public policy objectives are also accountable to local communities and their elected representatives. This is important since all unmet public health, mental health, and substance use disorder issues ultimately land on county responsibility in its role as the first and/or last responder for the community via the sheriff department, county jail, local court system, juvenile justice system, health department or community hospital. The direct state and county partnership with required public transparency and shared accountability reduces the likelihood of gaps in the behavioral health safety net for local communities.

Representative Whiteford and her colleagues are to be commended for their interest and previous actions in strengthening the public mental health system. Unfortunately, House Bills 4925-4929, despite the good intentions of its sponsors, may create even more significant problems in the public mental health system than it is designed to resolve. For example, the bills as proposed will result in the following:

- Dramatically reduces the role of county governments and CMHSPs by severing them from any shared governance responsibility, input or financial oversight of Medicaid mental health and substance use disorder services, including allocated PA2 liquor tax funding for prevention and treatment services.

- Creates an entirely new Administrative Services Organization (ASO) overseen by partisan interests in Lansing and far removed from local accountability, community needs and service delivery.
- Permits continued fragmentation of specialty mental health and substance use disorder services by empowering the new ASO to selectively re-direct public resources away from the CMHSP safety net without any concern or direct accountability to the local communities and persons and families depending upon these services.
- Usurps established processes for access, eligibility, customer services, recipient rights protections, quality management and other core CMHSP responsibilities that are responsive to stakeholders and essential components of the local community of care.

As a result of the concerns noted above, the Bay County Board of Commissioners passed a resolution on June 8, 2021 opposing any legislative changes that fail to honor the existing state and county partnership for community mental health safety net services and its inherent accountability to the communities, persons and families receiving these services. This includes any legislative changes that will reduce the role of the CMHSPs and counties in the shared governance responsibility, input or financial oversight of Medicaid mental health and substance use disorder services, including PA2 liquor tax resources.

As an alternative, BABHA encourages the legislature to continue to support the incremental system changes led by the Michigan Department of Health and Human Services that are consistent with emerging practices such as Comprehensive Community Behavioral Health Clinics (CCBHCs) and Behavioral Health Homes that improve healthcare integration directly at the point of consumer contact, enhance the existing state and county partnerships for CMHSP safety net services and produce more sustainable outcomes for our communities.

Thank you for the opportunity to comment on these very important matters. If we can ever be of any assistance to your office, please contact us at (989) 895-2347.

Sincerely,



Christopher Pinter
Chief Executive Officer

cc: House Health Policy Committee
Governor Gretchen Whitmer
Speaker of the House Jason Wentworth
Representative Annette Glenn
Representative Timothy Beson