

January 23, 2024

Centers for Medicare & Medicaid Services
Health and Human Services
Attention: CMS-10398 #45, OMB control number: 0938-1148

Submitted via regulations.gov

**RE: Medicaid and Children's Health Insurance Program (CHIP) Generic Information Collection
Activities: Proposed Collection; Comment Request (CMS-10398 #45)**

On behalf of National Council for Mental Wellbeing (National Council), thank you for the opportunity to comment on the Centers for Medicare & Medicaid Services' (CMS) notice, Medicaid and Children's Health Insurance Program (CHIP) Generic Information Collection Activities: Proposed Collection; Comment Request ("the Notice"), at 89 *Federal Register* ("FR") 1095 (January 9, 2024). National Council is a membership organization that drives policy and social change on behalf of nearly 3,400 mental health and substance use treatment organizations and the more than 10 million children, adults, and families they serve. We are committed to all Americans having access to comprehensive, high-quality care that affords every opportunity for recovery and we advocate policies to ensure equitable access to high-quality services, build the capacity of mental health and substance use treatment organizations and promote a greater understanding of mental wellbeing as a core component of comprehensive health and health care.

We are deeply grateful for your efforts regarding Certified Community Behavioral Health Clinics (CCBHCs) and for the continued work in implementing the Section 223 CCBHC Demonstration Grant Program as described in this Notice and associated materials. CMS' efforts to further implementation of CCBHCs improve access to evidence-based and lifesaving mental health and substance use disorder services for Americans across our country.¹

In consideration of the draft application for the CCBHC 2024 State Proposal Demonstration included in CMS-10398 #45, National Council recommends including language in the draft application to clarify that states that have received *any* CCBHC planning grant can apply to this program. While this Notice describes that the application is required to be completed by existing CCBHC grantee states in accordance with section 11001 of the Bipartisan Safer Communities Act (BSCA) of 2022 (89 FR 1096), the language in the draft application does not explicitly describe that states having received *any* CCBHC planning grant can apply. Communication with the Substance Abuse and Mental Health Services Administration (SAMHSA) has affirmed that any state that received a CCBHC planning grant in the past can apply for this CCBHC demonstration application; thus, the eligible applicant pool includes the most recent 15 states (e.g., AL, DE, GA, IA, KS, ME, MS, MT, NH, NM, NC, OH, RI, VT, WV) as well as the previous recipients of the planning grant (e.g., AK, CA, CO, IL, IN, MA, MA, TX). Making this clarification in the application will help ensure that all eligible applicants have the clarity needed to pursue this opportunity.

¹ <https://www.thenationalcouncil.org/resources/2022-ccbhc-impact-report/>

National Council appreciates the opportunity to provide these comments. We welcome any questions or further discussion about the recommendations described here. Please contact Reyna Taylor at ReynaT@thenationalcouncil.org. Thank you for your time and consideration.

Sincerely,



Charles Ingoglia, MSW
President & CEO
National Council for Mental Wellbeing