

# PUBLIC SUBMISSION

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CMS-10398 #45 (Certified Community Behavioral Health Clinic (CCBHC) 2024 State Proposal Demonstration Application)

**Comment On:** CMS-2024-0002-0001

Medicaid and Children's Health Insurance Program (CHIP) Generic Information Collection Activities: Proposed Collection; Comment Request

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Comment on CMS-2024-0002-0001

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## General Comment

Related to Document CMS-10398 #45 (OMB control number: 0938-1148), the Guidance to Planning Grant States to Apply to Participate in the Section 223 CCBHC Demonstration Program, we have three comments:

- Related to the information contained on Page 2: Additional information about the definition of "assisted outpatient mental health treatment" from the PAMA language is needed, in order to further clarify how preference will be given to CCBHC Demonstration programs that improve the availability of, access to, and participation in assisted outpatient mental health treatment in the state.

- Related to Page 4: Related to the description of what must be included in Attachment 6, additional clarification is needed on what exactly is being requested. For example, does the "description of the scope of services required by the state" encompass simply the listing of service codes/services that will be covered under our proposed model, or are SAMHSA and CMS looking for much greater detail about what each of the services will include (e.g., including specifics like staffing ratios/requirements, evidence-based practices, etc.)? Additional detail about what components should be included in the description will be helpful in assuring we are able to provide all information needed to evaluate our plan.

- Related to Page 24: Please add explicit reference in the introduction of Section 6, indicating that if a state has determined that all CCBHC services will be delivered via our state-run FFS system (outside of Managed Care), Section 6 of the Application related to Managed Care Considerations is not required to be completed.