

Author Full Name : Jenna Ellis**Received Date :** 12/20/2024 12:17 PM**Comments Received :**

To: Miriam E. Delphin-Rittmon, Ph.D.
Substance Abuse and Mental Health Services Administration (SAMHSA)
Department of Health and Human Services

Subject: Comment on Proposed Evaluation of Zero Suicide Framework

Dear Dr. Delphin-Rittmon,

I write to express American Family Association's significant concern regarding SAMHSA's proposed evaluation of the Zero Suicide Framework. While suicide prevention is a critically important endeavor, we are troubled by the explicit integration of an ideologically driven framework that risks prioritizing political agendas over evidence-based approaches to mental health.

Specifically, the notice emphasizes behavioral health equity and cultural adaptations to treatments, even while acknowledging the lack of empirical evidence supporting such adaptations. By aligning these efforts with a broader Diversity, Equity, and Inclusion (DEI) narrative, SAMHSA risks conflating sound mental health strategies with controversial and unproven initiatives. Suicide prevention must remain rooted in rigorous, evidence-based research rather than speculative or ideologically influenced approaches.

We are particularly alarmed by the potential for this framework to advance misleading narratives about gender dysphoria and its relation to suicide risk. Assertions that gender transition treatments, including the use of puberty blockers and surgical interventions, are necessary to prevent suicide lack robust scientific support. On the contrary, growing evidence indicates significant physical, psychological, and developmental harms associated with such treatments.

Further, SAMHSA's framework appears to undermine parental rights by promoting a narrative that may pressure parents into consenting to drastic, life-altering medical interventions for their children. This approach disregards the critical role of parents in making informed decisions for their children and risks alienating families at a time when unity and support are most needed.

SAMHSA's mission to reduce suicide must focus on universally effective strategies that transcend cultural or ideological divides. We urge the agency to prioritize:

Evidence-Based Research: Ensure all recommendations are supported by high-quality, peer-reviewed research. Avoid promoting treatments or interventions without robust, longitudinal studies.

Parental Engagement: Recognize parents as primary decision-makers for their children's health and well-being. Suicide prevention efforts should support, not undermine, family cohesion.

Non-Ideological Approaches: Remove any partisan or ideologically driven elements from the framework to foster trust and collaboration across diverse communities.

By refocusing on evidence, family, and neutrality, SAMHSA can more effectively address the urgent issue of suicide prevention without politicization or unintended harm.

Sincerely,
Jenna Ellis, Senior Policy Adviser
American Family Association