



December 2, 2022

The Honorable Patty Murray
Chairwoman
Senate Committee on Health, Education,
Labor, and Pensions
154 Russell Senate Office Building
Washington, D.C. 20510

The Honorable Richard Burr
Ranking Member
Senate Committee on Health, Education,
Labor, and Pensions
217 Russell Senate Office Building
Washington, D.C. 20510

Dear Chairwoman Murray and Ranking Member Burr:

On behalf of The Joint Commission, I am writing to express support for provisions related to mental health parity, recovery housing, and the integration of mental and physical health services included in H.R. 7666, the Restoring Hope for Mental Health and Well-Being Act of 2022.

Founded in 1951, The Joint Commission seeks to continuously improve health care for the public in collaboration with other stakeholders, by evaluating health care organizations (HCO) and inspiring them to excel in providing safe and effective care of the highest quality and value. An independent, not-for-profit organization with a global presence, The Joint Commission accredits and/or certifies more than 25,000 HCOs and programs in the United States. The Joint Commission evaluates HCOs across the continuum of care, including nearly 3,800 organizations under its Behavioral Health Care and Human Services Accreditation program (BHC). The Joint Commission's BHC programs cover organizations that provide mental health and substance use disorder (SUD) services in various settings, such as inpatient, residential, group homes, intensive outpatient, partial hospitalization, outpatient, school-based and other ambulatory settings. Although accreditation is voluntary, a variety of federal and state government regulatory bodies recognize The Joint Commission's decisions and findings for Medicare or licensure purposes.

The Joint Commission supports the provision in H.R. 7666 that would provide more resources to states to enforce mental health payment parity law. We support stronger enforcement of mental health payment parity laws because it will help reduce the financial and access barriers that occur when the coverage of treatment for these services is not comparable to physical health services.

The Joint Commission also supports the provision in H.R. 7666 requiring the U.S. Department of Health & Human Services Secretary to develop nationally recognized standards, in consultation with national accrediting entities, to ensure high-quality recovery housing for individuals experiencing a SUD. Variations in operations across the country, combined with the need to ensure that care delivery meets professionally recognized standards in quality and safety, make it necessary to establish national recovery housing standards. The Joint Commission requires recovery housing organizations accredited through its BHC program to meet evidence-based standards addressing care and treatment, including medication management, documentation of care, and organizational leadership, among other areas. The Joint Commission welcomes the opportunity to participate in the standards development process for recovery housing.

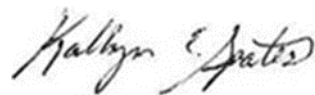
The Joint Commission Letter Re: H.R. 7666

The Joint Commission also supports the provision in H.R. 7666 authorizing grants for the collaborative care model, which integrates mental and physical health services. The collaborative care model typically requires primary care providers to develop an evidence-based care plan with the assistance of mental health specialists as well as patient and family engagement that addresses both physical and common mental health needs. The patient's progress is monitored by the care team and, if specialty care is needed, the primary care provider can refer to the appropriate mental health specialist. We support this model because it helps to ensure that patients with physical health needs also have their mental health needs addressed, which will likely improve overall patient outcomes. Integration of these services will also help normalize and destigmatize mental health treatment.

Another successful example of federal recognition of mental and physical health integration is the Certified Community Behavioral Health Clinic (CCBHC) program. This program serves as an effective integrated model of care providing access to a comprehensive set of mental health and SUD services while also providing primary care. We commend Congress for expanding the CCBHC Medicaid demonstration program through the Bipartisan Safer Communities Act earlier this year. The Joint Commission also supports amending the statute outlining CCBHC criteria to give priority to applicants if they are accredited by a nationally recognized accreditation body. Just as the federal statute lists the services and care delivery settings requirements for CCBHCs, it is important to recognize accreditation in the CCBHC federal statute as an indicator of meeting evidence-based health and safety standards.

If you have any questions, please do not hesitate to contact me or Tim Jones, Senior Associate Director, Federal Relations at 202-783-6655 or tjones2@jointcommission.org.

Sincerely,

A handwritten signature in cursive script that reads "Kathryn E. Spates".

Kathryn Spates, JD
Executive Director, Federal Relations