

February 1, 2008

The Honorable Norm Coleman
United States Senate
Washington, D.C. 20510

Dear Senator Coleman:

The National Council for Community Behavioral Healthcare is pleased to offer its strong support for S. 2578 that would temporarily delay application of proposed changes to Medicaid payment rules for case management and targeted case management services.

The 1,400 mental health and substance abuse provider organization members of the National Council serve over 6 million low-income children and adults with mental illness and addiction disorders across the country, and are often the providers of these critical case management services.

Case management-related services are an integral part of our country's mental health and addiction service delivery system since its inception. For persons with the most disabling forms of mental health-related disorders, case management services are the most critical services within persons' individual plans of service. Persons with severe disorders and their families are reliant upon functional case management services to facilitate their access to many other needed systems of treatment and support which enable them to experience integrated living in their communities. Without such case management services, many of these individuals would require more costly, less integrated care, including institutionalization.

Unfortunately, the Interim Final Rule issues by CMS has the potential to severely limit the case management supports that are available to persons with mental illness and would also saddle cash-strapped state and local governments with new obligations when they can least afford them. In our view, the regulation appears to stray far beyond the TCM definition included in the 2005 Deficit Reduction Act, and imposes costly new administrative requirements on community-based safety net providers as well as state and local governments that appear nowhere in the underlying statute.

Thank you for your leadership on this important issue. We look forward to working with you to advance this legislation in the 110th Congress.

Sincerely,



Linda Rosenberg, MSW, CSW
President and CEO