

December 2, 2020

The Honorable Alex Azar
Secretary
U.S. Department of Health & Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

The Honorable Robert Redfield, MD
Director
Centers for Disease Control & Prevention
395 E Street, SW #9100
Washington DC 20201

Dr. Jose Romero
Chair
Advisory Committee on Immunization Practices
395 E Street, SW #9100
Washington DC 20201

RE: Prioritizing Mental Health and Substance Use Providers in COVID-19 Vaccine Distribution

Dear Secretary Azar, Director Redfield, and Doctor Romero:

On behalf of the National Association of State Mental Health Program Directors (NASMHPD), the National Council for Behavioral Health and the Mental Health Corporations of America (MHCA), we are writing to urge you to **include community based mental health and substance use providers as frontline providers as a plan for the distribution of COVID-19 vaccines is created**. Together, our members serve more than 10 million Americans with severe mental illness, including schizophrenia and bipolar disorder, as well as individuals with substance use disorders. Many of the individuals our members serve, because of the nature of these diseases, do not recognize the symptoms of COVID-19 and therefore arrive to their trusted mental health or substance use provider possibly carrying the virus. We are writing to ensure the providers and staff of community based mental health and substance use treatment organizations are included as frontline providers and receive priority distribution under the COVID-19 vaccine roll out plan for our nation.

In making recommendations regarding the distribution of COVID-19 vaccines to key target populations, it is our understanding that the Advisory Committee on Immunization Practices (ACIP) will be guided by an explicit evidenced-based method based on the Grading of Recommendations, Assessment, Development and Evaluation (GRADE) Approach. In turn, the GRADE approach underpins the ACIP Evidence to Recommendations framework that, among other things, will inform decisions on target populations for vaccine (e.g., age range, sex, immune status, pregnancy). Employing these methods, ACIP will soon make proposals on the allocation of vaccines to key segments of the U.S. population including frontline health care workers, persons living in long-term care facilities and elderly Americans – particularly individuals with comorbid chronic diseases encompassing diabetes, heart disease and serious respiratory illnesses.

We write today to call to mind that mental illness and substance use disorder are also chronic conditions and often require long-term inpatient and outpatient care on a revolving and routine basis. **Providers working in inpatient psychiatric hospitals, residential substance use treatment facilities, community behavioral health organizations and outpatient substance use disorder treatment facilities are essential health care providers and should be categorized as frontline providers, therefore making them eligible to receive a COVID-19 vaccine in its earliest phase of distribution**. Specifically, the frontline providers in question are psychiatrists, psychologists, psychiatric nurses, clinical social workers,

mental health counselors, addiction treatment counselors and peer support professionals. The Substance Abuse and Mental Health Services Administration (SAMHSA) concurs with this judgment.

In a May 7, 2020 letter to mental health and substance use providers across the nation, Dr. Eleanor McCance-Katz, the Assistant Secretary for Mental Health and Substance Use, wrote the following: *“During this time, it is critical that these individuals continue to get the care and treatment they need. A significant portion of this care will be provided in face-to-face settings. This care will often require physical contact and examination of patients performed by health care professionals. This letter is to certify agreement by the Substance Abuse and Mental Health Services Administration (SAMHSA), U.S. Department of Health and Human Services, **that the services provided in mental and substance use disorder treatment programs across the country are essential medical services**”* [emphasis added].

These essential medical services include responding to the dueling mental health and substance use epidemics that were plaguing the nation before the arrival of COVID-19. Providers are now routinely putting themselves at risk for infection when performing necessary in-person treatment services like medication injections case management services, and providing care for those experiencing psychiatric or substance use emergencies. Despite increased allowances in telehealth, much of the care provided in mental health and substance use facilities must be provided in-person, face-to-face with patients on a routine basis. These frontline providers, our members, do all of this to ensure vulnerable patients adhere to their treatment plans to achieve and maintain wellness and stability amidst the pandemic.

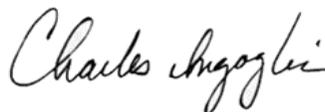
It is well documented that mental illness and substance use have been on the rise in response to the COVID-19 pandemic. According to a Kaiser Family Foundation Tracking Poll conducted earlier this year, 53% of adults in the U.S. reported that their mental health had been negatively impacted by worry and stress related to COVID-19. According to the White House Office of Drug Control Policy, overdose fatalities were up nearly 12% compared to last year. The American Medical Association reports that more than 30 states have already seen increases in opioid-related deaths. In order to protect our nation’s mental health and substance use workforce, **they must be treated as the frontline providers they are and must be included among the Phase 1 vaccine distribution group** alongside emergency room physicians, emergency and intensive care nurses and first responders including police officers, firefighters and emergency medical personnel.

Thank you for your attention to this important matter.

Sincerely,



Brian Hepburn, MD
Executive Director
NASMHPD



Chuck Ingoglia, MSW
President and CEO
National Council for Behavioral Health



Dale Shreve, MSW
President and CEO
Mental Health Corporations of America