

To: Texas Health & Human Services Commission

Subject: Legislative Appropriations Request Recommendations from the Network of Behavioral Health Providers

Date: November 16, 2023

Greetings,

My name is Sydney Carter, and I am the Policy Program & Special Projects Manager at the Network of Behavioral Health Providers (NBHP). NBHP is a collaborative of the leadership of over 40 public and private, for-profit and non-profit mental health and substance use treatment providers in Greater Houston. I am pleased to provide comments today concerning NBHP's recommendations to HHSC concerning the Legislative Appropriations Request to the Texas Legislature.

NBHP stands firmly behind the belief that all Texans who suffer with mental illness and/or substance use disorder(s) deserve access to timely, high-quality care. Increasing the amount of funding available to various areas of the behavioral health system in Texas will help ensure an increase in access to care that millions of vulnerable Texans so desperately need and deserve. We believe the following issues should be included in HHSC's request to the Texas Legislature for the 2026-2027 Texas Budget:

- Increase the Medicaid reimbursement rate for various behavioral health services. Mental health and substance use disorder services historically have received lower Medicaid reimbursement rates than comparable physical health services. Additionally, the Medicaid reimbursement rate for Mental Health Peer/Recovery Support Specialists is abysmally low. Finally, rate increases for substance use disorder service providers, *without expecting a decrease in capacity of people served*, are necessary. ***We urge HHSC to prioritize increasing the Medicaid reimbursement rate, as well as rates for substance use disorder service providers, for behavioral health services.***
- Increase funding for the public behavioral health (mental health and substance use) care system in Texas to expand capacity in terms of services. Prevention, early intervention, and treatment services not only provide people with the services they need but are a much more cost-effective option than the alternatives of homelessness, incarceration, and emergency room utilization. The earlier these illnesses are appropriately identified and treated, the better the outcomes. In addition, prevention services, including for suicide and opioid overdose prevention, are a far more cost-effective investment than the potential costs of the health care, criminal justice, and other systems. If prevention fails, there also must be a pathway for residents in need to easily access recovery treatment services. ***We thank the Legislature for the passage of SB 26, and recommend the state dollars to be allocated to support community organizations that support children, and also***

urge HHSC to request increased funding for both state-contracted mental health and substance use treatment services.

- Allocate specific funding towards recovery housing in Texas.

For those experiencing a behavioral health issue, housing is often the cornerstone of treatment. Without a safe, stable place to live, medication adherence and abstinence from substances can prove difficult. In addition, many who leave acute care treatment need a transitional period of housing and wraparound support to successfully reintegrate back into the community. Additionally, there is a strong need for expansion of community services; such as case management, supportive housing, psychosocial programs, and supportive employment, that will assist people in remaining in their communities. The availability of supportive services such as these will better encourage and support Texans in remaining in their communities and decrease the likelihood of people returning to jail or hospitals. ***We urge HHSC to request the following investments for recovery housing:***

- Access to accredited recovery housing is inconsistent across the state. **218 counties in Texas have no identified recovery housing**, according to the 2022 NSTARR study. While Texas has consistently provided support for accreditation of level I recovery homes, there has been little to no support for the accreditation of level II or III recovery housing. The subsequent gap leaves a large population of vulnerable Texans unserved.
- HB 299, which passed in the Texas 88th legislative session, **requires recovery homes to be accredited** to receive any state funding beginning in September 1, 2025
- **The state is potentially out of compliance with Substance Use Block Grant allowable expenditure restrictions** effective October 1, 2023; which states, "Recovery Housing facilities are required to be nationally or state certified and/or licensed as a SUD recovery housing facility by a government entity." (42 U.S.C. 290ee-5; section 550 PHS Act).
- Texans across the state will have **better access to** a wider range of **accredited recovery housing**, which is an **evidenced- based approach to address substance use disorder**, according to SAMHSA's 2023 Best Practices for Recovery Housing.
- This investment will help to **lower financial barriers** and **incentivize recovery homes to serve marginalized individuals** across the state while **ensuring proper use of state funds** and **providing safe, quality recovery housing for underserved communities** and aligns with section D.2.4 of the Statewide Strategic Plan.

Thank you so much for your time and for the opportunity to provide comments. Please do not hesitate to reach out if you have any comments, questions, or concerns. I can be reached via email at scarter@nbhp.org, or by phone 346-578-8761.

Sincerely,
Sydney Carter