



December 14, 2024

The Honorable Xavier Becerra
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Re: [Florida Medicaid's Managed Medical Assistance \(MMA\) Section 1115 Demonstration Amendment Request](#)

Dear Secretary Becerra:

NAMI appreciates the opportunity to submit comments in support of the amendment request to the Florida Managed Medical Assistance (MMA) section 1115(a) demonstration. NAMI, the National Alliance on Mental Illness, is the nation's largest grassroots mental health organization and is dedicated to building better lives for people affected by mental illness. NAMI Florida is a NAMI state organization that serves residents across the state with free mental health support, online groups, resources and education.

Access to coverage and care is essential for people with mental illness to successfully manage their condition and get on a path of recovery. Medicaid is a lifeline for many Americans as the nation's largest payer of mental health (MH) and substance use disorder (SUD) servicesⁱ, with nearly 40 percent of Medicaid beneficiaries having MH/SUD conditionsⁱⁱ. Through Medicaid coverage, people with mental health conditions can access critical services like therapy, inpatient treatment, and prescription medications. Amidst an increasing mental health and substance use crisis in Florida and in the U.S. overall, new strategies are needed to ensure equitable access to quality health care and social support services. NAMI appreciates the state's efforts in testing innovative solutions to address unmet needs.

We strongly support Florida's waiver amendment requesting authority to expand the Behavioral Health and Supportive Housing Assistance pilot into two new regions encompassing 41 counties. We urge approval of this amendment by CMS and believe it will promote the objectives of Medicaid.

Housing Services & Supports

We strongly support Florida's request to expand housing services through the Behavioral Health and Supportive Housing Assistance pilot. We urge its approval by CMS. People with

mental illness are overrepresented in the unhoused population, as about one in five people experiencing homelessness in the U.S. have a serious mental health conditionⁱⁱⁱ. Homelessness has a profoundly negative impact on mental health, and children are especially susceptible to the psychological effects of homelessness and housing instability^{iv}.

NAMI supports public policies that provide stable, safe, and affordable housing, support recovery, and prevent hospitalizations and involvement in the criminal justice system^v. Various federal, state and local housing programs have proven benefits for people with mental illness, yet these programs are often underfunded and only serve a fraction of individuals in need. Incorporating health related social needs (HRSN) services into Medicaid coverage helps connect Medicaid beneficiaries to critical community services.

Florida's proposal intends to help address unmet housing needs by offering additional behavioral health services and supportive housing assistance services to more individuals aged 21 and older with serious mental illness (SMI), substance use disorder (SUD), or SMI with co-occurring SUD, who are homeless or at risk of homelessness due to their disability. This program currently operates in two regions of the state and has shown promising results, including reducing inpatient and emergency department utilization and participant gains in achieving permanent stable housing and reducing days of homelessness.

Through this proposal, the state will expand the pilot into two new regions encompassing 41 counties in the north and central parts of the state, broadening the pool of eligible Medicaid beneficiaries for the pilot by over 4,700. Overall, NAMI is pleased to see Florida pursue opportunities available under Medicaid to cover clinically appropriate and evidence-based services and supports that address HRSNs. We note that the state maintains that the total dollar amount allocated for the pilot will remain the same, amounting to no impact on budget neutrality. We appreciate that the state is in the best position to understand the budgeting of this program; at the same time, we encourage CMS to monitor programmatic spending as a part of quarterly reporting and evaluation design. Understanding the level of demand for, and supply of, these services will ensure that everyone who needs these services can access them.

Conclusion

Thank you for the opportunity to provide comments on this important issue. We strongly believe that the proposals outlined in this demonstration amendment request will further the objectives of the Medicaid program and enhance the mental health of beneficiaries in Florida. If you have any questions or would like to discuss this issue, please do not hesitate to contact Hannah Wesolowski, NAMI Chief Advocacy Officer at hwesolowski@nami.org, or Carali McLean, NAMI Florida Executive Director at executivedirector@namiflorida.org.

Sincerely,



Hannah Wesolowski

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NAMI

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ⁱ Medicaid and CHIP Payment and Access Commission, “Behavioral Health in the Medicaid Program—People, Use, and Expenditures,” June 2015, <https://www.macpac.gov/wp-content/uploads/2015/06/Behavioral-Health-in-the-Medicaid-Program%E2%80%94People-Use-and-Expenditures.pdf>.

ⁱⁱ Heather Saunders, Madeline Guth and Nirmitta Panchal, “Behavioral Health Crisis Response: Findings from a Survey of State Medicaid Programs,” Kaiser Family Foundation, May 2023, <https://www.kff.org/medicaid/issue-brief/behavioral-health-crisis-response-findings-from-a-survey-of-state-medicaid-programs/>.

ⁱⁱⁱ U.S. Department of Housing and Urban Development, “HUD 2020 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations,” December 2020, https://files.hudexchange.info/reports/published/CoC_PopSub_NatlTerrDC_2020.pdf.

^{iv} Ellen L. Bassuk, Molly K. Richard and Alexander Tsertsvadze, “The Prevalence of Mental Illness in Homeless Children: A Systematic Review and Meta-Analysis,” *Journal of the American Academy of Child & Adolescent Psychiatry*, Vol. 54, No. 2, February 2015, <https://www.sciencedirect.com/science/article/abs/pii/S0890856714007989>.

^v National Alliance on Mental Illness (NAMI), “Social Determinants of Health: Housing,” <https://www.nami.org/advocacy/policy-priorities/supporting-community-inclusion-and-non-discrimination/social-determinants-of-health-housing/>.