



Senator Jim Abeler, Chair  
Human Services Reform Finance & Policy Committee  
Minnesota State Senate

March 29, 2022

Dear Chair Abeler and Members of the Committee

I am writing as the public policy and compliance counsel for Fraser, Minnesota's largest provider of children's mental health services.

Thank you for hearing Senator Wiklunds' Senate File 4151 – Certified Community Behavioral Health Clinics (CCBHC) policy changes.

Fraser provides mental health services to approximately 3,000 individuals and families a year. Our clients, ranging from individuals in early childhood through adulthood, live throughout Minnesota. We provide children's therapeutic support services including preschool and adolescent day treatment, ARMHS, and individual and group therapy, among other services. These services can be more easily accessed by clients under a CCBHC model. The team model used in CCBHC also supports collaboration between providers when a client receives more than one service. We firmly believe this collaboration leads to more effective care.

MN Certified Community Behavioral Health Clinics (CCBHCs) started as a new model of delivering integrated behavioral health care to Minnesotans. Originally a federal demonstration, Fraser is thrilled CCBHC is now a Medical Assistance (MA) benefit in Minnesota.

Fraser would like to thank you and the rest of the legislature for supporting the CCBHC model.

Fraser strongly supports the CCBHC model because it allows for coordinated team care that reduces barriers for clients. In addition, the model supports innovation and a focus on the client's needs.

CCBHC as a model was designed with the vision to be a one-stop shop for all eligible clients to receive integrated community mental and chemical health services, with care coordination and streamlined supports from our mental health system. This is opposed to clients and providers having to navigate our fragmented systems for care. Currently, there is no single statutory or regulatory authority today that recognizes all the CCBHC services and requirements under one integrated clinic entity. These current standards have conflicting requirements. This translates to increased costs and time for providers that are already strapped under the ongoing pandemic and workforce crisis.

The current regulatory requirements for mental health clinics result in duplication or the use of waivers to bridge gaps between the mental health standards in place 20 years ago when statute was passed and current practices. Additionally, CCBHC supports coordinating care to increase the benefits and outcomes with current services. Under the current structure, care coordination efforts are not reimbursed and, as a result, may not happen.

With increased needs across the state for mental health services, it is imperative that we create a model that provides the greatest benefit in an efficient and effective way. This bill will help providers focus on clients rather than on regulatory requirements.

This bill seeks to take steps in streamlining the model's requirements as CCBHC grows and evolves in Minnesota. I am asking you to please support the passage of SF 4151 to help us continue to increase access and sustain our mental health care in Minnesota.

Thank you!

A handwritten signature in black ink that reads "Abigail Vavra". The signature is written in a cursive, flowing style.

Abigail Vavra  
Public Policy and Compliance Counsel