



June 21, 2023

The Honorable Gus Bilirakis
2306 Rayburn House Office Building
Washington, DC 20515

The Honorable Kathy Castor
2052 Rayburn House Office Building
Washington, DC 20515

Dear Representatives Bilirakis and Castor:

The National Association for Children's Behavioral Health (NACBH), a nationwide nonprofit coalition of licensed and accredited children's behavioral health providers, is writing to express our strong support for the bipartisan Ensuring Medicaid Continuity for Children in Foster Care Act ([H.R.4056](#)) led by your offices. NACBH is committed to advancing the field of children's behavioral health and leveraging our expertise to shape the legislation that affects the children we serve every day. Our nationwide membership includes nonprofit behavioral health treatment facilities from Alaska to Mississippi providing crisis intervention, home-based and community wraparound services, as well as intermediate levels of care such as intensive outpatient, partial hospitalization, and residential treatment programs.

We thank the House Energy and Commerce Committee for their commitment to reauthorizing the Substance Use Disorder Prevention that Promotes Recovery and Treatment (SUPPORT) Act and ensuring that young patients have access to the behavioral health care they need. Many of our members serve youth in the child welfare system as well as their birth and foster families, meaning we necessarily braid funding across Medicaid and Title IV-E. However, due to the Institutions for Mental Disease (IMD) exclusion, our Qualified Residential Treatment Program (QRTP) designated facilities are currently ineligible for a federal Medicaid match for any of the health care services delivered to patient residents. This exclusion magnifies mental and physical health equity issues in the communities we serve and contributes to lack of treatment availability for necessary acute care in rural, urban, and suburban areas.

The nation is facing a pediatric mental health crisis; the past 10 years have seen a 50% increase in negative mental health outcomes for high-school aged youth¹ and a 62% increase in suicide death rates among youth aged 12-17. Simultaneously, child welfare system-involved youth are at a higher risk for trauma and mental and behavioral health needs, heightening Medicaid coverage issues for the patients with the greatest need. Up to 80% of children in foster care have significant mental and behavioral health needs² and youth with child welfare system experience are nearly four times more likely to have considered or attempted suicide compared to youth who had never been in foster care.³

The Ensuring Medicaid Continuity for Children in Foster Care Act would finally exempt QRTPs from the IMD exclusion, ensuring that physical and mental health coverage is available to foster care children in necessary residential treatment environments. By making this simple change – cross-referencing title IV-E and Medicaid statute – we can clarify federal directives to State Medicaid Agencies and take the guesswork out of treating patients. With our strong support, we urge you to swiftly advance this legislation out of committee and to the House floor to ensure every child and family has access to the level of care clinically indicated for them.

¹ Centers for Disease Control and Prevention. (2023). Youth Risk Behavior Survey Data Summary & Trends: 2011-2021.

² Dore, M. (2005). Child and adolescent mental health. In G. Mallon and P. Hess (eds.), *Child Welfare for the Twenty-first Century: A Handbook of Practices, Policies and Programs*. (148-172) New York: Columbia University Press.

³ Pilowsky DJ, Wu LT. (2006). Psychiatric symptoms and substance use disorders in a nationally representative sample of American adolescents involved with foster care. *J Adolesc Health*. 38(4):351-8. doi: 10.1016/j.jadohealth.2005.06.014. PMID: 16549295; PMCID: PMC1472845.

NACBH

National Association for Children's Behavioral Health

Sincerely,

NACBH Board of Directors, Policy Committee

Barry Robinson Center

Gibault Children's Services

Brightpoint (formerly Children's Home & Aid)

Klingberg Family Centers

Canopy Children's Solutions

Northwood Children's Services

Crossroad Child & Family Services