

February 29, 2016

The Honorable Joseph Vitale, Chair
Senate Health, Human Services and Senior Citizens Committee
569 Rahway Ave.
Woodbridge, NJ 07095

Testimony in Support of S1710 with Recommendations

"Provides for licensure of ambulatory care facilities to provide integrated primary care services including behavioral health care."

Dear Chairman Vitale and Members of the Committee:

On behalf of the New Jersey Association of Mental Health and Addiction Agencies, Inc. (NJAMHAA), I want to thank Chairman Vitale, Vice-Chair Madden and the other members of the Committee for the opportunity to offer comments in support of Senate Bill 1710 which would permit ambulatory care facilities to provide integrated primary care services including behavioral health care. I would also like to thank the sponsors of this bill, Senator Vitale and Senator Singer, for recognizing the need for treating the whole person and supporting the move toward integrated care.

NJAMHAA represents 160 hospital-based and freestanding non-profit mental healthcare and substance use treatment providers who serve over 500,000 New Jersey children and adults with mental health and substance use disorders annually. The expertise of these organizations is unmatched, as are the standards of care they meet and exceed. Across the board, our members are supportive of integrated healthcare models that permit greater coordination between traditional primary healthcare staff and behavioral healthcare staff. Many currently operate integrated models of care, ranging from Program for Assertive Community Treatment (PACT) teams to co-locating primary physicians at existing service sites; and all have advocated with NJAMHAA for many years for behavioral health homes that are finally becoming a reality here in New Jersey.

Despite this broad support for integrated care approaches, NJAMHAA and its members do have several concerns about Senate Bill 1710. We are pleased that one of our earlier concerns, the limited listing of professionals within the bill, has

been addressed and the bill now includes certified or licensed substance abuse counselors, licensed professional counselors, and licensed marriage and family therapists. Several significant concerns remain, which I have listed below.

- Establishment of one license for integrated care should incorporate all current standards for the provision of mental health and substance use treatment services. Integrated healthcare programs that do not meet the standards of care set by the Division of Mental Health and Addiction Services (DMHAS) create a risk for poor quality of care.
- Establishment of one license for integrated care should be reciprocal to behavioral health providers offering certain primary care services on site.
- The Department of Health does not have the expertise to monitor behavioral health services, nor does the Division of Mental Health and Addiction Services have the expertise to monitor primary healthcare services. Monitoring responsibilities for both services need to be specified in the bill.
- The bill seeks to allow ambulatory care facilities the ability to provide outpatient treatment services for “individuals who exhibit either mild or moderate symptoms of a behavioral health disorder”, but the bill does not define “mild or moderate”. The bill should specify who will be responsible for formulating the definitions and criteria to be used to assess whether an individual meets those definitions.

NJAMHAA is a strong supporter of integrated care, but urges you to take steps to ensure a high quality of care by applying established standards and ensuring appropriate monitoring. We also urge you to ensure that individuals have greater access and receive the appropriate level of care by making a modifier available to behavioral health providers and establishing who will define the terms within this bill.

I thank you for your tireless efforts to address the needs of New Jersey’s residents with mental health and substance use treatment needs and look forward to continuing to work with you toward that end. Please do not hesitate to contact me at 609-838-5488 extension 292 or at dwentz@njamhaa.org to discuss this legislation or any matter on which I might be of assistance to you.

Sincerely,

Debra Wentz, Ph.D.
President and CEO