



December 22, 2021

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

RE: Medicaid School Mental Health Services

Dear Secretary Becerra:

I write to urge you to prioritize updating the Medicaid School Health Technical Assistance Guideⁱ and Administrative Claiming Guideⁱⁱ to help state and local school districts do their part to address the mental health needs of our nation's youth. I am grateful for your leadership in holding roundtables to learn the impact of the pandemic on American children and adolescents' mental health and am encouraged by the Surgeon General Vivek Murthy's advisory, "Protecting Youth Mental Health," which highlighted the mental health crisis among children and issued a poignant call to action. I believe it is imperative that these Medicaid guides, which have not been updated since 1997 and 2003, respectively, be updated with guidance that gives state and local school districts the tools they need to serve their youth more effectively.

As the Surgeon General's advisory pointed out, mental health challenges among youth have been rising steadily over several years and have been exacerbated by COVID-19. In fact, nearly one in three parents (31%) shared that their children's emotional health is worse than before the pandemic.ⁱⁱⁱ Last year, the percentage of emergency department visits for mental health crises, including suicide attempts, rose dramatically (24-31%) for children and youth.^{iv} And more than 140,000 children have experienced the death of a parent or grandparent caregiver during the pandemic.^v Yet, few children are getting the services and supports they need to promote resiliency and wellness.

Schools provide an ideal setting to support children's mental wellness and to provide accessible services for those with mental health challenges. However, the lack of clear, updated Medicaid guidelines has resulted in barriers to state and local school districts using Medicaid funds to serve the many students who need mental health services. Updating guidance documents would allow CMS to:

- Incorporate the 2014 free care policy reversal, which expands eligibility for school-based Medicaid programs;^{vi}
- Promote the use of telehealth services;
- Address billing, documentation and other barriers to schools receiving Medicaid reimbursement;^{vii} and
- Share best practices and state examples of using Medicaid to increase the availability and coordination of mental health services for students.

Providing updated guidance is urgently needed and a vital first step to enabling more equitable access to Medicaid mental health services in schools that help our youth. Thank you, again, for your leadership and support of children's mental health. As an organization dedicated to transforming the health care system by uniting mental health advocates, business leaders, and government agencies in advancing mental health policy, I stand ready to assist you in this vital work.

Sincerely,

A handwritten signature in black ink that reads "Amy J. Kennedy". The signature is written in a cursive style with a large initial "A".

Amy Kennedy
Education Director
The Kennedy Forum

CC: The Honorable Chiquita Brooks-LaSure, Administrator, Centers for Medicare and Medicaid Services (CMS)
The Honorable Daniel Tsai, Deputy Administrator and Director, Center for Medicaid and CHIP Services (CMCS)

ⁱ Centers for Medicare and Medicaid Services. (1997). Medicaid and school health: A technical assistance guide. Retrieved from http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Financing-and-Reimbursement/Downloads/School_Based_User_Guide.pdf

ⁱⁱ Centers for Medicare and Medicaid Services. "Medicaid school-based administrative claiming guide." *Centers for Medicare and Medicaid Services* (2003).

ⁱⁱⁱ National Survey: Youth Well-Being During COVID-19. (Jan 29, 2021). The Jed Foundation. <https://jedfoundation.org/news-views/national-survey-youth-well-being-during-covid-19/>

^{iv} Leeb RT, Bitsko RH, Radhakrishnan L, Martinez P, Njai R, Holland KM. Mental Health-Related Emergency Department Visits Among Children Aged <18 Years During the COVID-19 Pandemic—United States, January 1—October 17, 2020. *MMWR Morb Mortal Wkly Rep* 2020;69:1675-1680. <https://www.cdc.gov/mmwr/volumes/69/wr/mm6945a3.htm>

^v S Hillis, et al. Covid-19-Associated Orphanhood and Caregiver Death in the United States. *Pediatrics*. DOI: 10.1542/peds.2021-053760 (2021).

^{vi} Centers for Medicare and Medicaid Services. (December 15, 2014). Medicaid Payment for Services Provided without Charge (Free Care). State Medicaid Director Letter# 14-006. Available at <http://www.medicaid.gov/federal-policy-guidance/downloads/smd-medicaid-payment-for-services-providedwithout-charge-free-care.pdf>.

^{vii} Pudelski, Sasha. "Structural Inefficiencies in the School-Based Medicaid Program Disadvantage Small and Rural Districts and Students." AASA, *The School Superintendents Association* (2020).