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January 29, 2024

Rep. Brenda Landwehr
Committee on Health and Human Services
300 SW 10th St.
Topeka, Kansas 66612

Subject: Testimony Against Kansas State HB 2578

Dear Rep. Landwehr and members of the Committee on Health and Human Services,

I am writing to express my opposition to Kansas State House Bill 2578, which seeks to modify the Kansas Certified Community Behavioral Health Clinic (CCBHC) statute by directing certification exclusively for Community Mental Health Centers. As a representative of Heartland Community Health Center, a Federally Qualified Health Center (FQHC) that provides integrated behavioral health and psychiatry services independently and in collaboration with our local CCBHC, I believe this proposed legislation could have detrimental consequences for the mental health care landscape in Kansas.

FQHCs play a crucial role in addressing the diverse healthcare needs of the communities they serve across the state, including providing essential behavioral health services. Behavioral health is key in providing integrated care due to the role primary care plays in the treatment of behavioral health. For example, an estimated 66% to 75% of all depression cases are treated by primary care providers. Heartland Community Health Center, like our FQHC partners across the state, are committed to delivering high-quality, integrated care to vulnerable populations, and we believe that limiting CCBHC certification to only Community Mental Health Centers may hinder our ability to fulfill this mission effectively.

The exclusion of FQHCs and other qualified providers from the CCBHC certification process could limit access to care where and when it is needed most. Federally Qualified Health Centers have a proven track record of delivering accessible and culturally competent mental health services to underserved populations. For example, Heartland Community Health Center offers a variety of mental health services including brief intervention therapy, counseling/therapy, pediatric and adult psychiatry, and substance use disorder treatment. In 2022, Heartland Community Health Center provided care to 4,498 patients with behavioral health conditions. We work closely with our area CCBHC partner to both receive and accept referrals for behavioral health services between the two organizations where the care best serves the need of that patient. Restricting CCBHC certification to Community Mental Health Centers may inadvertently limit the reach and accessibility of behavioral health care services in the state.

Denying CCBHC certification to FQHCs and other qualified service providers based on their organizational structure may overlook the valuable contributions they make to the mental health care system in our state. I urge the committee to reconsider the language in HB 2578 and ensure that it promotes inclusivity and collaboration among various healthcare entities, including FQHCs. A more inclusive approach to CCBHC certification would enhance the capacity of the mental health care system to meet the growing needs of Kansas residents and promote a holistic model of care that addresses both physical and mental health.

Thank you for considering my perspective on this matter. I am available to provide further information or clarification if needed. I hope you will carefully weigh the potential impact of this legislation on the mental health care landscape in Kansas and consider alternative approaches that foster collaboration among all qualified providers.

Sincerely,

Elizabeth Keever
Chief Development Officer
Heartland Community Health Center