



PROTECTION & ADVOCACY SERVICE, INC.

Michelle Roberts, Executive Director

November 6, 2019

COMMENTS BY ANDREA RIZOR, DIRECTOR OF ADVOCACY, MICHIGAN PROTECTION & ADVOCACY SERVICE, INC., ON FUNDING FOR COMMUNITY MENTAL HEALTH SERVICES

John McCulloch
President
Royal Oak

Hansen Clarke
1st Vice President
Detroit

Jane Shank, MSW
2nd Vice President
Interlochen

Mark Stephenson
Treasurer
Troy

Paul Palmer
Secretary
Lansing

Thomas H. Landry
Immediate Past President
Highland

Pamela Bellamy, Ph. D.
Lansing

Alethea Brinkerhoff
Bloomfield Hills

Douglas P. Olsen
East Lansing

Selena M. Schmidt
Shelby Township

Mark Wiedelman
Troy

Michigan Protection & Advocacy Service, Inc. (MPAS) is a private, nonprofit, nonpartisan organization mandated by federal and state law to advocate for people with disabilities in Michigan. MPAS handled over 200 cases and over 700 short-term assistance matters last year related to disputes over access to community services. We are pleased to offer comments on how the state's financing decisions may prevent disputes and improve services and supports for people with disabilities. In our experience, any financing system must:

- Incentivize robust network adequacy and continuity of care. Many disputes arise when funders try to save money by reducing rates and shrinking provider networks, resulting in less access to services and volatility in maintaining providers that individuals and families have worked hard to secure.
• Maintain a broad service array. Disputes also arise because of service cuts, especially home supports and support coordination. Participants in the 2017 Section 298 affinity groups identified particular problems with dental care, transportation, and medication management. Mental health medications are especially vulnerable to changes in financing systems because they have historically been sheltered from prior authorization, step therapy and other cost-cutting restrictions.
• Spend money up front. Community-based services are better and often cheaper. Failing to provide them often exacerbates crises and shifts service responsibility to ill-equipped jails, prisons, and hospitals. The main knock against community-based services is "we have never provided them." Let's provide them.
• Acknowledge and fund public services in the criminal justice system. Federal law does not allow Medicaid reimbursement for incarcerated individuals, and the state has historically underfunded mental health and other services in prisons and jails.
• Trust individuals and families. One-size-fits-all approaches and across-the-board caps on services ignore the reality that people have very different needs that change over time. We believe that individuals and families – not providers, government, or private shareholders – are best equipped to identify what supports are most effective and most economical.

For more information, please contact Andrea Rizor, Director of Advocacy, in our Lansing office or at arizor@mpas.org.

Main Office:
4095 Legacy Parkway, Suite 500 - Lansing, MI 48911-4263
517.487.1755 (Voice or TTY)
800.288.5923 (Information and Referral)
517.487.0827 (Fax)

Marquette Office:
129 W. Baraga Ave., Suite A - Marquette, MI 49855-4644
906.228.5910
866.928.5910 (Toll Free)
906.228.9148 (Fax)