

SUMMARY AND RESPONSE TO 45-DAY PUBLIC COMMENTS

Comment Letter # 1

Scott Gilman, Director of San Mateo County Behavioral Health and Recovery Services
7-29-2020

Comment

On behalf of San Mateo County Health, I write in support of the Department of Health Care Services (DHCS) proposed amendment to California Code of Regulations, title 9, section 1840.332 (Adult Residential Treatment Service (ARTS) Provider Requirements, DHCS-15-009) to eliminate the requirement for Mental Health Rehabilitation Centers (MHRCs) to also obtain a Social Rehabilitation Program (SRP) certification. Current MHRC licensing requirements are comparable to, and in most instances, exceed SRP certification standards, and hence render the SRP certification requirement duplicative and unnecessary.

Since 2012, San Mateo County Health has been working to expand opportunities for smaller MHRCs to provide ARTS to seriously mentally ill clients to support their recovery journey. Currently, County Health is in the process of building four 16-bed MHRC facilities to be operated by provider organizations who enter into agreements with the County. Removing the requirement for MHRC's already licensed by the Department of Health Care Services to also have to acquire SRP certification will streamline processes to establish an MHRC that offers ARTS and subsequently will increase efficiencies for both the DHCS and MHRC programs through the elimination of redundant administrative requirements. This will make operating these programs more attractive to potential provider organizations and less burdensome to administer. Ultimately, this reform will benefit mental health consumers by expanding the opportunity to receive ARTS through this level of care in support of their recovery.

For these reasons, San Mateo County Health supports DHCS' proposed amendment to California Code of Regulations, title 9, section 1840.332 (Adult Residential Treatment Service (ARTS) Provider Requirements, DHCS-15-009).

Response

The Department appreciates your comment of support.