



# ASSOCIATION OF OREGON COMMUNITY MENTAL HEALTH PROGRAMS

Addictions • Mental Health • Developmental Disabilities

Cherryl L. Ramirez  
Executive Director  
cramirez@aocweb.org

Diana L. Bronson  
Executive Assistant  
dbronson@aocweb.org

Sarah Jane Owens  
Developmental Disabilities Spec.  
sjowens@aocweb.org

Silas Halloran-Steiner, President  
Yamhill County Health & Human Services

David Hidalgo, 1st Vice President  
Multnomah County Mental Health and  
Addiction Services

Barb Seatter, 2nd Vice President  
Mid-Columbia Center for Living  
Sherman, Hood River & Wasco

Karla McCafferty, Secretary/Treasurer  
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Baker County  
Mountain Valley Mental Health Programs, Inc.

Benton County Health Department  
Clackamas County Health, Housing  
& Human Services

Clatsop Behavioral Healthcare  
Columbia Community Mental Health  
Confederated Tribes Community  
Counseling Center of Warm Springs

Coos County Mental Health  
Community Living Case Management  
Coos, Curry, Douglas, Josephine Counties

Crook County Mental Health  
Lutheran Community Services

Curry Community Health  
Deschutes County Health & Human Services  
Douglas County  
Community Health Alliance

Grant, Morrow, Wheeler & Gilliam Counties  
Community Counseling Solutions

Harney County Symmetry Care, Inc.  
Jackson County Health and Human Services

Jefferson County  
BestCare Treatment Services

Klamath Basin Behavioral Health  
Klamath County Developmental  
Disabilities Program

Lake County Mental Health  
Lane County Health and Human Services  
Lincoln County Health and Human Services

Linn County Health Department  
Malheur and Umatilla Counties  
Lifeways, Inc.

Marion County Health Department  
Polk County MH & Addiction Services  
Sherman, Hood River & Wasco Counties  
Mid-Columbia Center for Living

Tillamook County  
Tillamook Family Counseling Center  
Umatilla County  
Addictions Program/DD Program

Union County  
Center for Human Development, Inc.

Wallowa County  
Wallowa Valley Center for Wellness  
Washington County Behavioral Health &  
Developmental Disabilities Division

## Testimony on SB 832 – To provide grants for integrating mental health and physical health services to CCOs

### To Senate Human Services & Early Childhood Committee

**March 24, 2015**

Dear Chair Gelser and Members of the Senate Human Services & Early  
Childhood Committee,

On behalf of the 32 community mental health programs across Oregon, the  
Association of Oregon Community Mental Health Programs (AOCMHP)  
supports the development of integrated behavioral health care in both  
primary care and specialty behavioral health settings, and there are many  
examples where this is working under today's Coordinated Care  
Organization (CCO) model.

We are unclear, however, on if there is in fact a statewide problem that  
needs to be solved through this proposed bill. We are able to integrate care  
under the current system with existing local healthcare contracting options -  
between CCOs, patient centered primary care homes, community mental  
health programs and other system partners. Within many CCO coverage  
areas, behaviorists are being placed into primary care settings and  
coordination of care is taking place that includes shifting payment models to  
support these services.

We oppose the language that requires a fee for service reimbursement  
model for these integrated behavioral health services. This is moving Oregon  
in the wrong direction. CCOs were created to be responsive to local health  
ecosystems and under this bill they would now be required to pay for care in  
a manner that might be inconsistent with local strategy or identified need.  
Instead, we need alternative payment models that cover the cost of care  
coordination and integrated healthcare in a bundled payment that can be tied  
to improved health outcomes.

Additionally, we do not support using \$ 1 million of State General Funds for  
activities that might be better contained within a CCO's global budget and  
allow for Medicaid funds to be matched so that \$ 1 million could be turned  
into closer to \$ 3 million. Rather, we support OHA's intent to map out the  
behavioral health system and feel it would be precipitous to direct limited  
State General Funds towards something we don't know is a problem.

These issues can be addressed through local system improvements that are allowable under CCO structure today, or through a larger statewide planning process that ensures a balanced approach such as a mental health task force or work group.

Thank you for the opportunity to express our concerns about the consequences of this bill.

Sincerely,

A handwritten signature in black ink, appearing to read "Silas Halloran-Steiner". The signature is written in a cursive style with a horizontal line through the middle of the name.

Silas Halloran-Steiner  
President, AOCMHP