The Department of Children and Families (DCF) is the state's lead agency on children's behavioral and mental health services. The Department has built a broad service array to provide care to children struggling with these issues and to help their parents navigate a complex and somewhat fragmented system of care where most services are performed by dedicated non-profit providers. It is often stated that Connecticut has one of the best provider networks for children's mental health in the country. We have also worked to reduce the stigma associated with mental health treatment and believe that children and their families should feel comfortable seeking assistance when they need help. DCF works closely with partner state agencies that both provide services and assist families in navigating the procedures of their private health insurers, Medicaid and other forms of public assistance. It is in this context that the Department expresses concerns about whether Raised Bill 6509 will complement or confuse our current system of care.

Most of our licensed outpatient psychiatric clinics for children (OPPC) provide mental health services at existing school-based health centers (SBHC). We refer to these as "off-site services" as defined in DCF regulations. The Department's licensing division reviews a sample of such cases during relicensing visits and ensures that they are held to the same standards as clinic-based services.
The DCF regulations cover all of the relevant provisions for the delivery of mental health services but do not address school specific facility issues. Currently, the OPPC providers who operate in schools are doing so at school-based health centers and physical environment requirements are addressed through DPH quality standards. If an OPPC provider were to operate a school-based mental health clinic, it could have to do so under two different sets of regulations - one for basic clinic operations per DCF, and one for school-based mental health clinic operations should the Department of Public Health (DPH) adopt regulations. This could result in duplicative or contradictory standards for essentially the same service.

It is also important to point out that the creation of school-based mental health clinics would require substantial resources that are not currently budgeted. DCF is already providing mental health services through schools and looking for opportunities to expand those services when feasible and necessary. We ask the committee members to refer to the CT Children’s Behavioral Health Plan, which includes several ideas on how to make these services more accessible for families. Compiled by the CT Children's Behavioral Health Plan Implementation Advisory Board, the plan and related progress reports can be found here: CT Children's Behavioral Health Plan.

The Department is concerned that transferring oversight of these services to DPH undermines our statutory mandate as the agency responsible for children's mental health and will likely establish a duplicative system of regulation. DCF and our provider network stand ready to collaborate with policy makers to realize the recommendations in the CT Children's Behavioral Health Plan and eliminate the fragmentation in the delivery system.

Thank you very much for the opportunity to testify.