



STATE OF MICHIGAN
DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

RICK SNYDER
GOVERNOR

NICK LYON
DIRECTOR

November 15, 2017

Ms. Margo Sharp
Bureau of Medicaid Policy and Health System Innovation
Medical Services Administration
P.O. Box 30479
Lansing, MI 48909-7979

Dear Ms. Sharp:

The Behavioral Health and Developmental Disabilities Administration is writing in response to the proposed policy regarding Provider Enrollment Fitness Criteria 1635-PE. Our administration has been contacted by agencies and organizations regarding the policy implications for persons with lived experience in mental health, substance use and co-occurring disorders who have a background in criminal convictions of less than 10 years.

In 2006, the peer workforce was established as a Medicaid provider. As an Evidence Based Practice, peers use their lived experience in recovery from mental illness and addictions to connect with beneficiaries served by the public behavioral health system. A significant number of peers employed by the Prepaid Inpatient Health Plans and Community Mental Health Services Programs have past convictions of less than 10 years. They are directly working with beneficiaries who have the same criminal background record. This peer to peer model for justice involved individuals is recognized nationally.

Michigan is a national leader recognized for the peer workforce, receiving a significant number of federal grants employing and supporting justice involved individuals. Several grants have and are currently being co-lead with the Michigan Department of Corrections. Employers have specifically hired peers with lived experience to mirror the populations in drug, mental health, veterans, human trafficking courts, integrated care settings and re-entry of individuals from corrections as returning citizens.

This proposed policy will cause an employment barrier leading to the termination of a significant number of peer positions. This will result in a workforce shortage and have a negative impact on peers who are living as productive and contributing members of their community. In addition, beneficiaries served will be personally impacted by losing the choice of a peer provider. To preserve the integrity of the peer and recovery coach workforce we are respectfully requesting a meeting to discuss the policy to brainstorm possible solutions. We look forward to your response.

Sincerely,

A handwritten signature in black ink that reads 'Thomas J. Renwick'.

Thomas J. Renwick, Director
Bureau of Community Based Services
Behavioral Health and Developmental Disabilities Administration

c: Lynda Zeller

Larry Scott

Pam Werner