



California Public Employees' Retirement System

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April 27, 2023

Miriam E. Delphin-Rittmon, Ph.D., Assistant Secretary
Office of the Assistant Secretary for Mental Health and Substance Use
Substance Abuse and Mental Health Services Administration
5600 Fishers Lane
Rockville, MD 20857

Subject: Draft 2023-2026 Strategic Plan

Dear Assistant Secretary Delphin-Rittmon,

On behalf of the 1.5 million active members, retirees, and their dependents that the California Public Employees' Retirement System (CalPERS) represents, we thank you for the opportunity to provide comments on the Substance Abuse and Mental Health Services Administration's (SAMHSA) Draft 2023-2026 Strategic Plan (Draft Strategic Plan). The burden of untreated and undertreated behavioral health conditions is both a major population health problem and a delivery system challenge. We applaud SAMHSA's efforts to improve behavioral health access and treatment and support each of the priorities and guiding principles outlined in SAMSHA's Draft Strategic Plan, as they align with our current efforts and strategic priorities.

As the purchaser of health benefits for the State of California and almost 1,200 public agencies and schools, we provide a wide selection of high-quality health plan options to our members and their families, which include health maintenance, preferred provider, and exclusive provider organization (HMO, PPO, and EPO) plans. Although statewide and national efforts have made important improvements in behavioral health care delivery, our behavioral health systems continue to suffer from limited workforce capacity, exacerbated by the COVID-19 pandemic, and inadequate infrastructure to track and improve outcomes at the patient and population levels. We support initiatives that keep the prevention, treatment, and behavioral health promotion continuum at its core, with an emphasis on equity, and a commitment to data and evidence.

Through the CalPERS 2022-2027 Strategic Plan, we are working to improve health care quality, access, and affordability, to ensure our members receive affordable, equitable, high-quality care when and where they need it. We believe behavioral health is a fundamental cornerstone to health and well-being. To this end, CalPERS and its health plans are working to increase equitable access to behavioral health screening and treatment through the promotion of advanced primary care, integration of primary care and behavioral health, and maximizing tele-behavioral health options, where appropriate. To drive improved behavioral health outcomes,

we are holding our health plans accountable to behavioral health performance measures related to depression screening and follow-up and medication therapy for opioid use disorder, and stratifying those measures by demographic factors. We aim to further develop our behavioral health measure set to be person- and outcomes-focused and appreciate the work outlined in the Draft Strategic Plan to establish thoughtful and meaningful behavioral health measures.

We thank you again for the opportunity to respond to this important strategic planning effort. As you move through the planning and implementation process, we are happy to be a resource for you, so please do not hesitate to reach out. We look forward to working with SAMHSA to improve person-centered behavioral health prevention and treatment services.

Sincerely,

Don Moulds
Chief Health Director