

STATE OF RHODE ISLAND



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March 19, 2026

The Honorable Susan R. Donovan, Chair
House Committee on Health & Human Services
State House
Providence, RI 02903

RE: 2026 — H 7142 — An Act Relating to Behavioral Healthcare, Developmental Disabilities and Hospitals – Certified Community Behavioral Health Clinics Accountability and Oversight Act

Dear Chair Donovan:

On behalf of the Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH), please accept this letter of concern regarding H 7142, which creates the Certified Community Behavioral Health Clinics Accountability and Oversight Act.

BHDDH shares and appreciates the General Assembly's commitment to transparency, accountability, and fiscal responsibility, and is fully committed to providing the General Assembly with the information it needs to perform its functions.

The Certified Community Behavioral Health Clinic (CCBHC) model is governed by strict federal criteria established by the Substance Abuse and Mental Health Services Administration (SAMHSA) and the Centers for Medicare & Medicaid Services (CMS). Rhode Island's CCBHC program is carefully designed to meet these specific federal requirements, including compliance with federal CCBHC certification standards, to ensure continued funding and participation in the federal demonstration program and to provide an integrated range of services to Rhode Island's most vulnerable populations.

If recommendations made by the proposed joint oversight committee conflict with clinical and fiscal reporting requirements, the state's federal standing, reimbursement rates, and the overall sustainability of the CCBHC infrastructure could be challenged.

BHDDH licenses and regulates behavioral healthcare providers in Rhode Island, including certified CCBHC providers. This responsibility ensures that clinical services meet rigorous safety and quality standards. In addition, BHDDH shares responsibility for the collection, review and reporting of CCBHC data with a broader interagency group within EOHHS. H 7142 thus appears to create duplicative data collection and reporting processes.

Additionally, H 7142 creates overlapping responsibility with the standing House Committee on Oversight. Establishing a separate committee for the sole purpose of CCBHC oversight may result in duplicative work for members of the House as well as for our Department.

We believe that the goals of transparency and accountability in H 7142 are met through existing executive reporting and the work of the standing Committee on Oversight. We look forward to working with the Honorable Members of this Committee in ensuring Rhode Islanders benefit significantly from the success of CCBHCs in our communities.

Thank you for the opportunity to offer comment on this legislation.

Sincerely,



Richard Leclerc
Director

cc: Honorable Members of the House Committee on Health & Human Services
Honorable Julie A. Casimiro
Nicole McCarty, Esquire, Chief Legal Counsel to the Speaker of the House
Lynne Urbani, Director of House Policy