

**From:** [Nancy Lane](#)  
**To:** [DHSR.SMFP.Petitions-Comments](#)  
**Subject:** [External] Proposed change to Psychiatric and Substance Abuse Methodologies  
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Long Term and Behavioral Health Committee  
Attn: Amy Craddock, Assistant Chief Health Planning and CON Sectin

Thank you for the opportunity to comment on proposed changes to the Psychiatric and Substance Abuse Bed Methodologies for the 2021 State Medical Facilities Plan. Data and policies are well presented.

North Carolina shares in the national mental health dilemma of insufficient resources for behavioral health. Given the uneven distribution of behavioral health beds among the LME's, the limited types of beds that are covered by CON, and the changing nature of care solutions, the April 2020 staff proposal to provide more flexibility in the SMFP is a good one. Adherence to the policy of inviting LME comment will continue to acknowledge this group, and permit other advocacy groups to play a significant role as well.

It will provide uniform state tracking information on utilization and distribution of beds, yet give willing providers flexibility to make specific cases regarding how they will reasonably fill proposed new beds.

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