



No Health without Mental Health
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January 29, 2020

Joshua Gordon, M.D., Ph.D., Director
National Institute of Mental Health
35 Convent Dr, Bldg. 35, Rm. 1C-905
Bethesda, MD 20892

Re: **National Advisory Mental Health Council Meetings – Period for Public Comment**

Dear Director Gordon,

NHMH – No Health without Mental Health, www.nhnh.org, a nonprofit patient advocacy organization, and the undersigned organizations write to express our serious concern regarding the unacceptably limited period for in-person public comment at the National Advisory Mental Health Council meeting of February 4, 2020 (see attached emails).

The NAMHC meeting notice describes a severely circumscribed period for public comment. Out of a total 2 hour meeting, a total of only 5 minutes is allotted for external stakeholder comments. And of that 5 minutes, a time limit of 3 minutes per speaker is imposed. Effectively allowing for 1 and ½ persons to offer public comment. This approach reflects a lack of regard for the patients, caregivers, advocates and general public attending NAMHC meetings to learn AND engage with the NAMHC.

While we realize there are other ways to provide input to NIMH/NAMHC, having an opportunity to discuss matters with the Council at their gathering, is critical. Providing written input does not always allow an opportunity for discussion with the members of the Council. We know because in 2015 a very fruitful NAMHC meeting discussion led directly to a HHS-wide conference on integrated care in 2017.

Your staff indicates “we have not turned away an individual or group who would like to speak” but that fact is not communicated to stakeholders in the notice. Instead, the 5 minute total limit, and of the 3 minute limit per person is very clearly indicated in the notice. Discouraging members of the public who might have wished to engage.

Your extremely limited in-person public comment period, in effect 10 mins per year given NAMHC’s biannual schedule, is completely out-of-sync with current priorities in healthcare, one of which is a patient-centered approach and regular engagement with relevant external stakeholders.

All of the undersigned organizations request that NIMH re-consider this policy and allow for a minimum of 30 minutes of public comment at the end of each NAMHC meeting. Please let us know your response as soon as possible.

With regards,



Florence C. Fee, Executive Director (florencefee@nhmh.org)
NHMH – NO HEALTH WITHOUT MENTAL HEALTH

Ron Manderscheid, Ph.D., Executive Director
NATIONAL ASSOCIATION OF COUNTY BEHAVIORAL HEALTH & DEVELOPMENTAL DISABILITY DIRECTORS

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AMERICAN ASSOCIATION ON HEALTH & DISABILITY
DEPRESSION AND BIPOLAR SUPPORT ALLIANCE

cc: Francis Collins, M.D., Ph.D., Director, NIH