



CENTERSTONE

June 7 2019

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Comments submitted electronically only

Re: Comment on Recommendations of the NANC report regarding implementation of the National Suicide Hotline Improvement Act, WC Docket No. 18-336, CC Docket No. 92-105

Dear Madam Secretary:

We at Centerstone applaud the passage of the National Suicide Hotline Improvement Act of 2018 as well as the FCC's on-going consideration of a National Suicide Hotline. As a front-lines provider of behavioral healthcare, we see the growing need for high quality care. Today, suicide is the 10th leading cause of death overall and, for people ages 10-34¹, it's the 2nd leading cause of death². Untreated mental illness and substance use disorders also have prolific impacts for our economy. Nationwide, it is estimated employers are losing \$225.5 billion annually in costs associated with lessened productivity linked to unmanaged behavioral health conditions³. Moreover, out of the 1 in 5 American adults who experience mental illness in a given year, only about 40% receive treatment⁴. Fortunately, access to quality treatment can transform and save lives. ***That is why we fervently support efforts to designate an N11 number dedicated solely to those seeking help for behavioral health issues.*** There is no better time to implement this desperately needed resource than now.

Summary of North American Numbering Council (NANC) findings:

- The North American Numbering Council (NANC) filed a report with the FCC on May 13, 2019; in which the council was asked to provide recommendations on the feasibility of a 3-digit number assignment, cost-benefit analysis, and to determine if any current N11 number should be re-purposed for mental health and suicidal crises.
- Additionally, NANC was also tasked with identifying a number, including, if any current N11's assigned use should be extended or shared to include mental health or suicidal crises, or if a separate non-N11 number could or should be assigned for this purpose

¹ <https://www.cdc.gov/nchs/data/databriefs/db330-h.pdf>

² <https://www.nimh.nih.gov/health/statistics/suicide.shtml>

³ <https://healthpayerintelligence.com/news/employers-could-see-high-financial-returns-for-mental-healthcare>

⁴ Ibid



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- *In the May 13th NANC report, the council identified the following recommendations:*
 - There should be an extended/shared use of 211, to include mental health and suicidal crises alongside its 19-year designation of community information and referral;
 - A recommendation for 511 if a currently assigned N11 number must be repurposed; or

While we applaud the commission's review, we believe there was not full consideration, within the NANC report, of the urgent need for a unique, easy-to-access N11 for mental health emergence.

Centerstone Supports a Dedicated 3-Digit National Hotline Solely for Mental Health:

Centerstone urges the FCC to designate a currently undesignated, or repurpose a currently designated, N11 code for the sole-purpose of a national suicide prevention and mental health hotline. Establishing a ubiquitous, recognizable national number (similar to 411 or 911) for mental health and suicide prevention would be a transformative step for our nation's public health by making crisis resources more accessible, by addressing the deeply entrenched stigma associated with mental health conditions, and by relieving burden on other emergency or health systems. Whether an undesignated N11 number (611) or a designated, low-use N11 number (511), we urge the FCC to assign an N11 dialing code as a dedicated, sole-purpose number to respond to our mental health and suicide public health crises.

While there are other N11 numbers with varying degrees of public usage that could fit, the NANC report makes clear that expanding 211 to include mental health and suicide crisis could cause end-user confusion (i.e., *is this the number we call for help?*) and would likely result in insufficient coordination and longer implementation times as people filter through the system.

A dedicated 3-digit hotline would create a telephonic network exclusive for that purpose, getting people the help they need and diverting calls from 911 and the Emergency Department. Both are vital parts of our nation's emergency response, but neither is ideally situated to handle mental health and suicide crises. Furthermore, a designated 3-digit number for mental health would lessen the pressure on these overburdened systems.

As a multistate organization bringing care to nearly 180,000 individuals across Florida, Illinois, Indiana, Kentucky, and Tennessee, our nearly 4,000-person staff could easily spread word of a new N11 number to our patients, their families, and our community partners. Providing this resource would assist our communities in accessing the right intervention, and likely lower emergency department usage.

We stand ready to help make this national service a reality. Thank you, in advance, for your consideration of our input.



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Sincerely;

Becky Stoll, LCSW
Vice President, Crisis & Disaster Management
Centerstone

Lauren Conaboy, MSSW
Vice President, National Policy
Centerstone

About Centerstone:

Centerstone is one of the nation's leading not-for-profit providers of mental health and substance abuse disorder services, dedicated to delivering care that changes people's lives. Centerstone is a multi-state organization bringing evidence-based treatments and care to nearly 180,000 individuals with an array of behavioral health disorders and challenges residing throughout Florida, Illinois, Indiana, Kentucky, and Tennessee. In operation for over 63 years, we provide front-lines care in both inpatient and outpatient facilities. Centerstone is the only not-for-profit, behavioral health care provider with a research institute embedded within the organization, directly connecting the latest knowledge into clinical care. Through our Military Services, we offer specialized services to veterans, service members, and their families across the entire swath of the United States.

Our Noble Purpose: Delivering Care that Changes People's Lives