

April 5, 2018

Elinore McCance-Katz, M.D., Ph.D.  
Assistant Secretary for Mental Health and Substance Use  
Substance Abuse and Mental Health Services Administration (SAMHSA)  
Department of Health & Human Services  
5600 Fishers Lane  
Rockville, MD 20857

Dear Dr. McCance-Katz:

On behalf of the member companies of the Professional Services Council,<sup>1</sup> I am writing to express our concern that recent Substance Abuse and Mental Health Services Administration (SAMHSA) comments<sup>2</sup> and actions<sup>3</sup> devalue the critical role government contractors play in combatting substance abuse and serious mental illness. We believe that removing current and future SAMHSA technical assistance and evaluation contractors will deprive SAMHSA of the full range of capabilities and experiences available to meet its important mission.

It appears from your March 22<sup>nd</sup> blog post that your goal is to provide for more flexibility for communities to tailor their training and technical assistance needs. If so, PSC and our member companies who currently partner with SAMHSA would welcome a dialogue about how that can best be accomplished. Even with different policy objectives than years past, we believe that contractors are now, and can continue to be, part of SAMHSA solutions and successes. Existing contracts can be modified, not canceled, to allow for more scalability and community flexibility to select from a menu of training and technical assistance options.

### **Contracts Deliver Strong Outcomes & Offer Greater Accountability**

Compared with other tools, contracts use taxpayer money effectively and provide strong health outcomes. A contract offers SAMHSA greater accountability and control over implementation as the contract is binding, the statement of work is negotiated and stipulates specific actions/deliverables, key personnel require government review and approval, government penalties can be exercised, and there are standard contracting provisions to protect the government's interests. Contracts often offer stronger incentives for innovation and excellence, and there is a more rigorous government selection process for the highest skills and best past performance. For example, some Centers for Disease Control and Prevention (CDC) programs that provide substantive grants to states are now opting for centralized contracts because grants to states are not achieving the desired results.

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<sup>1</sup> PSC is the voice of the government technology and professional services industry, representing the full range and diversity of the government services sector. As a trusted industry leader on legislative and regulatory issues related to government acquisition, business and technology, PSC helps build consensus between government and industry. Our nearly 400 member companies represent small, medium, and large businesses that provide federal agencies with services of all kinds, including information technology, healthcare, engineering, logistics, facilities management, operations and maintenance, consulting, international development, scientific, social, environmental services, and more. Together, the trade association's members employ hundreds of thousands of Americans in all 50 states. Many of our member companies provide services of all kinds to HHS and its operating divisions.

<sup>2</sup> McCance-Katz, Dr. Elinore "SAMHSA Revamping TA-Contractors Model to Deliver More Support to American Communities." Posted March 22, 2018. Available at: <https://blog.samhsa.gov/2018/03/22/samhsa-revamping-ta-contractors-model-to-deliver-more-support-to-american-communities/#.WrjvaC7wb3g>.

<sup>3</sup> SAMHSA FY 2018 Opioid State Targeted Response Technical Assistance, (CFDA) Number: 93.788. Available at: <https://www.samhsa.gov/grants/grant-announcements/ti-18-004>.

**IDIQ Contract Vehicle Makes It Easier to Access Private Sector Expertise**

PSC is a strong supporter of transparency and accountability in sourcing decisions. Compared with grants, contracts provide a much greater degree of visibility into performance and accountability. By comparison, grants may often be more difficult to execute than contracts, especially when much of the work has already been done through established acquisition vehicles to help execute your priorities. As an example, SAMHSA already has an approved list of vendors on the SAMHSA indefinite delivery/indefinite quantity (IDIQ) contract vehicle. In Training & Technical Assistance, task orders can be easily issued under Domain 5. Evaluation studies can be issued under Domain 1. SAMHSA has already invested significant time and resources in establishing this contract vehicle and securing contractors who have self-identified as willing partners in achieving your mission objectives, often with a demonstrated track record of success and many noteworthy outcomes. Replacing awards made on a competitive basis under the IDIQ with sole source and restricted bids reduces transparency and rejects considerable talent and experience with states and communities at a time when more resources are needed, not less.

We are also concerned that excluding private sector partners will harm SAMHSA's ability to achieve its mission outcomes, and ultimately erode needed capabilities that support your important work and the millions of American families that depend on it.

**Different Tools = Different Partners**

SAMHSA has a range of engagement options to choose the mechanism and the partner in the best position to meet your evolving and unique needs. Partners examine the purpose, desired health outcomes, their capabilities matched against the government requirement, their experience, financial structure, etc. Some private sector partners are unable to support SAMHSA when a grant mechanism is used instead of a contract. Depending on the need, there are also ways for reaching non-traditional partners through a contract.

PSC and our companies who work with SAMHSA care deeply about combating substance abuse and mental health challenges. This partnership has achieved exceptional results for SAMHSA and the families and communities across the nation who rely on the services that SAMHSA provides. Therefore, I request an in-person meeting with you, to include several of our member companies who have a record of achievement working with SAMHSA.

Thank you for your attention in this matter. We look forward to the opportunity to discuss with you our ideas to improve the delivery of technical assistance within the current contract structure. In the interim, if you have any questions, please do not hesitate to contact me.

Sincerely,



Alan Chvotkin  
Executive Vice President and Counsel