

December 7, 2018

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Docket 18-336
Implementation of the National Suicide Hotline Improvement Act of 2018

Dear Commissioners:

I write on behalf of Lines for Life to urge you to designate a 3-digit code as a Behavioral Health and Suicide Crisis Lifeline. The time is now to embrace mental and emotional wellness as a national priority – and to deliver 3-digit access to crisis intervention services. Three-digit access will:

- Deliver timely and effective crisis intervention services to millions of Americans
- Make it easier to connect people in need with help
- Meet the *dramatically* growing need for crisis intervention
- Help eliminate the stigma of mental health by normalizing help seeking for mental illness with the same priority we deliver for services like fire and rescue, social service referral, and telecommunication referral for people with hearing disabilities

Lines for Life is Oregon's National Suicide Prevention Lifeline (NSPL) affiliate, and we work with the Veterans Crisis Line (VCL) to serve the nation's veterans as well. All in all, we service over 50,000 families each year through these two programs. Our highly skilled call counselors go through extensive training and operate under careful supervision to provide excellent, safe mental health crisis intervention. Our dedicated call counselors save lives – quite literally – every day. And like all NSPL affiliates, we at Lines for Life are subject to rigorous accreditation to ensure safe, healthy services to our clients in crisis – including accreditation by the American Association of Suicidology.

We believe 3-digit access to behavioral health and suicide crisis intervention is an important opportunity to meet the growing crisis of behavioral health in the United States. Just last week, the Centers for Disease Control reported that over 40,000 Americans died by suicide last year -- driving the national suicide rate to its highest rate in decades. The CDC also reported that drug overdose deaths had climbed to an all-time high – killing over 70,000 people last year – deaths that often represent a failure of effective mental health intervention, as people facing untreated mental illness resort to self “medication” through illicit drugs.

In 2004, the Substance Abuse and Mental Health Services Administration launched the National Suicide Prevention Lifeline as an integrated national effort to reach people in crisis, using the single number 1-800-273-TALK as a uniform access point to connect to crisis services. The NSPL has been a tremendous success – growing

from just a few calls that first year to over 2 million last year, including over 700,000 calls to the national Veterans Crisis Line.

The National Suicide Prevention Lifeline saves lives every day, helping thousands of people each day find a way forward through their darkest moments. Highly trained call counselors, at the VCL and over 160 call centers across the nation, help over 2 million Americans and their families each year cope with the challenges of mental wellness and suicidal crisis. The NSPL network is proof positive of the power of behavioral health and suicide crisis intervention. Extensive, independent research has proven the effectiveness of crisis intervention by the highly trained counselors of the NSPL affiliates nationwide.

The NSPL has experienced dramatic growth in the last five years – here at Lines for Life, our NSPL Lifeline volume has more than doubled in the last two years alone, and centers around the nation have likewise experienced dramatic growth.

Three-digit access is a natural next step given the growth and proven effectiveness of the National Suicide Prevention Lifeline.

Three-digit access is a timely and important opportunity to reach millions of American experiencing behavioral health or suicidal crisis.

And 3-digit access will also help remove the stigma associated with mental health challenges. 3-digit access to crisis services represent a national recognition that seeking help for behavioral health and suicidal crisis is just as much a part of life as seeking help for fire, for injury, or for other health and wellness needs. I cannot tell you how many parents I have met – parents who lost their child to untreated crisis – who have told me that they lost their child to *stigma*. These children grew up in a world where getting help for mental health crisis is shunned, uncool and something we don't talk about.

Establishing national 3-digit access to crisis services will help tear down the stigma that claims the lives of people struggling with mental health every day – as well as helping connect millions of Americans to help that works.

Finally, I note that the Commission has received comments from some suggesting that 211Info be used for 3-digit access to crisis intervention, rather than a dedicated behavioral health and suicide lifeline. I strongly disagree with this suggestion as it minimizes the imperative of effective crisis intervention and would simply add delay and complexity to obtaining crisis services – rather than easing access as Congress intends.

211Info provides a vital service – connection to rent assistance, energy assistance, maternal health services, information regarding pesticides, radon remediation services – a vast array of social services. But 211Info's mission and expertise do not include mental health services – and the reality is that crisis calls to 211 generally result in referral to an NSPL affiliate. Using 211 as a crisis portal would thus *add a layer* – of time and delay – to people in crisis who need help *now*. Moreover, using 211 as a crisis portal would forfeit the value in normalizing help seeking that would come from creating dedicated Behavioral Health Crisis and Suicide Lifeline. In short, we have great respect and appreciation for our colleagues at 211Info, and we support close partnership and jointly operated services where ever possible – but the reality is that mental health crisis intervention requires a very different expertise, and our nation's crisis in suicide and behavioral health warrants a service devoted exclusively to meeting these needs – not a service added to the long list of non-mental health related social services currently managed by 211Info.

Thank you very much for your interest and thoughtful approach to this important issue. We stand at the threshold of a revolution in improved mental health and wellness services for people throughout the United States. The FCC is poised to take an important step in that revolution by designating a 3-digit Behavioral Health and Suicide Crisis Lifeline. As a longtime member of the National Suicide Prevention Lifeline, we at Lines for Life stand ready to help make this national service a reality, and we urge the FCC to make this designation.

Very truly yours,



Dwight C. Holton
Chief Executive Officer
Lines for Life