

December 10, 2018

Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: WC Docket No. 18-336  
CC Docket No. 92-105  
Implementation of the National Suicide Hotline Improvement Act of 2018

Dear Commissioners:

Implementing a simple, easy to remember number such as 6-1-1 is an important first step toward helping the millions of Americans facing mental health, addiction, or suicidal crisis and/or their family members. Employing a simple to remember number that activates an immediate response by trained and caring mental health and addiction crisis experts will support the nation's suicide prevention efforts.

The National Action Alliance for Suicide Prevention (Action Alliance) is the nation's public-private partnership for suicide prevention. The Action Alliance brings together senior leaders from the public and private sector to advance the *National Strategy for Suicide Prevention*, and champion suicide prevention as a national priority. The Action Alliance focuses on three priorities: transforming health systems, transforming communities, and changing the conversation about suicide.

As part of our effort to transform health systems – and advance progress in crisis services – the Action Alliance developed [Crisis Now: Transforming Services is Within Our Reach](#), a report that recommends an “air traffic control” continuum approach to ensure no individual gets “lost” in the system and identifies the four core elements of effective crisis care. These core elements are:

- High-tech crisis call centers.
- 24/7 mobile crisis outreach and support.
- Crisis stabilization programs.
- Essential crisis care principles and practices.

The Crisis Now “air traffic control” approach aligns with the recommendations of the Centers for Medicare and Medicaid Services (CMS) in its November 13, 2018 [CMS Letter to State Medicaid Directors](#), regarding assessment of their crisis continuum and plans to build out capacity, focusing on crisis stabilization programs.

This year, the Action Alliance, in partnership with the National Association of Mental Health Program Directors (NASMHDP), RI International, and the National Suicide Prevention Lifeline launched the [Crisis Now website](#) to support implementation of the report's recommendations. The Action Alliance encourages the application of the recommendations from *Crisis Now* as part of the FCC review of current crisis response approaches.

In addition to establishing a national 6-1-1 or N-1-1 number, it is critical to consider the next crucial steps required to ensure the nation's crisis lines are adequately supported and part of a comprehensive crisis response system. Just as important as determining the appropriate N-1-1 number, is to:

- 1) Fundamentally transform the delivery of crisis care in our country to ensure that anyone experiencing a behavioral health crisis has access to the care they require – when, and where, they need it.
- 2) Adequately resource the National Suicide Prevention Lifeline to ensure adequate capacity nationally to support the crisis call center infrastructure and respond to increasing demand on the system.

*Crisis Now* reported that the National Suicide Prevention Lifeline (NSPL) has demonstrated its effectiveness and raised the performance bar for crisis call centers nationwide and recommended that *crisis call services should participate in and meet the standards of the NSPL, and crisis intervention systems should adopt and implement Zero Suicide/Suicide Safer Care across all program elements*. To ensure this is feasible, we encourage the FCC to consider sustained and sufficient support for the high-quality services delivered via the nation's crisis hotline providers.

Effective crisis response and meaningful crisis care will require more than changing the National Suicide Prevention Lifeline to a three-digit number. There must be substantial investment in the infrastructure of crisis call centers to provide help to the millions of people in the U.S. in need each year.

Sincerely,



Colleen Carr  
Director  
National Action Alliance for Suicide Prevention