

CLASP

Office of Disparities Research and Workforce Diversity (ODWD)
National Institute of Mental Health
Re: NOT-MH-20-073

Dear Office of Disparities Research and Workforce Diversity,

The Center for Law and Social Policy (CLASP) appreciates the opportunity to comment on the National Institute of Mental Health's *Request for Information: Fostering Innovative Research to Improve Mental Health Outcomes Among Minority and Health Disparities Populations* (NOT-MH-20-073). CLASP is a national, non-partisan, nonprofit organization with over fifty years of experience advocating for policy solutions that improve the lives of people with low incomes. We work across issue areas that impact families with low-incomes (e.g., mental health, health insurance, paid leave, early and postsecondary education, workforce, immigration, policy related to youth and young adults, and explicitly on maternal mental health) to advocate at the local, state, and federal levels for policy that will improve the health and well-being of the families with the lowest incomes in our country. At the core of our work is a strong focus on communities of color, and the factors and barriers revolving around policy access and implementation.

CLASP's policy and advocacy work primarily focuses on two populations: improving systems and policies that impact maternal mental health, and those that impact young adults' mental health and well-being. Our research recommendations are reflective of our work over the past years in building out our policy recommendations.

Our experience at CLASP is that paramount to research is learning from the perspectives of young people living in low income households, from ages 16-24, in urban and rural settings, across different racial and ethnic groups, as well as from those organizations that serve them. Our organization has done this through focus groups and youth voice engaging in policy/advocacy tables that CLASP is also a part of. The focus groups and conversations continue to update our knowledge about the participants' perceptions of mental health needs, issues, and services, and drew out voices and stories that inform both national and state deliberations. Our approach is to hear from young people with lived experience and incorporate their views to build a policy framework and analyses to better serve them, with racially equitable, and culturally responsive approaches embedded throughout.

CLASP seeks to elevate the issue of young adult mental health and well-being through qualitative and quantitative research, connecting to local youth systems and practitioners across systems, and advancing racial equity. We conducted focus groups with young people in Austin, TX, Baltimore, MD, and Honolulu, HI to help inform a paper highlighting the needs of young people in harder-to-reach communities. The paper was released in Spring 2019, entitled [Behind the Asterisk*: Perspectives on Young Adult Mental Health from "Small and Hard-to-Reach" Communities](#). Coupled with CLASP's 2017 paper, [Go-Throughs to Get Through: Mental Health Experiences of Young Adults in Poverty](#), this piece on understanding hard-to-reach communities emphasizes the impacts of historical and cultural trauma on one's mental health. Both papers emphasize the importance of hearing from individuals directly impacted, and ensuring that focus groups are conducted with respect and humility.

Our mental health work is also guided by an advisory board, comprised of 18 key experts in research, policy, and practice focused on mental health in mothers, young adult well-being, mental and behavioral health broadly, and Medicaid. Beyond the technical assistance they provide our staff and state partners, we have heard from them about innovations in elevating community practices. One of the suggestions from one of our advisory board members, Dr. Irán Barrera, along with extensive research, resulted in the development of the brief, [Redefining Evidence-Based Practices: Expanding Our View of Evidence](#). Our concern is that focusing solely on Evidence-Based Practices in research and policy ends up devaluing other culturally responsive practices that work for communities, particularly in communities of color.

Much of our work focuses on identifying economic, social, and other factors that exacerbate or influence one's mental health. As such, we have been asked to provide commentary like the accompanying memo to our Utah partners to show intersections between the social determinants of health and adverse mental health outcomes.

Finally, it is important to ensure that data collection occurs at trusted locations in ways that do not patronize or intimidate communities of color, and that methodologies are not only linguistically concordant, but always culturally sensitive. This means that methodologies will not be one-size-fits-all.

As all of CLASP's mental health work centers around racial equity, if you have any questions or would like to discuss further, we would be happy to. Please reach out to me at iweerasinghe@clasp.org and I would be happy to set up a meeting with my colleagues.

Thank you for considering our recommendations.

Sincerely,

Isha Weerasinghe
Senior Policy Analyst, mental health
Center for Law and Social Policy (CLASP)