



January 4, 2019

Jennifer Kent
Director
Department of Health Care Services
P.O. Box 997413, MS 0000
Sacramento, CA 95899-7413
Email: jennifer.kent@dhcs.ca.gov

Re: IMD Waiver Exclusion Application

Dear Director Kent,

The National Alliance on Mental Illness-California (NAMI-CA) strongly urges DHCS to submit a SMI/SED Demonstration Opportunity application [Section 1115 Medicaid Waiver] to the Center for Medicaid and Medicare Services. This would allow California to receive federal financial participation for services provided to Medicaid beneficiaries during short term stays for acute psychiatric care or residential treatment at facilities that qualify as Institutes for Mental Disorders (IMDs).

NAMI-CA is the statewide affiliate of the country's largest mental health advocacy organization, the National Alliance on Mental Illness. Our 19,000 members and 62 affiliates include many people living with serious mental illnesses, their families, and supporters. NAMI-CA advocates on their behalf, providing education and support to its members and the broader community.

Currently, adults with serious mental illness lack critical access to psychiatric care in community settings. The failure to provide federal funding for IMD facilities creates a shortage of available beds for needed psychiatric treatment. This issue disproportionately affects low-income individuals and results in excessive and undue financial burdens through hospitalizations and overuse of emergency departments.

We recommend the following specific policy inclusions, based on the goals and milestones laid out in the November 13, 2018 CMS State Medicaid Director letter [SMD #18—011]:

Increase availability of crisis stabilization services, with an emphasis on services made available through mobile crisis units;

Increase local points of access to care via community-based services by improving integration of primary and behavioral health care, and emphasizing referrals to sub-acute county services.

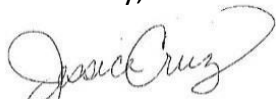
Create a more robust linkage structure between psychiatric hospitals/residential treatment facilities and community-based care, that emphasizes:

- The role of peers to connect beneficiaries with community-based providers;
- A process to assess beneficiary housing needs upon discharge, and as necessary, to connect beneficiaries with community providers that can coordinate access to suitable and stable housing services.

Leverage empirically-based peer services to create stronger linkages between inpatient and outpatient services, reduce lengths of stay in emergency departments, and support beneficiary recovery post-discharge.

The additional funding for IMDs offered under this waiver is critical to ensure that California has sufficient bed capacity to provide adults living with serious mental illness and their families access to essential mental health care. We strongly urge DHCS to complete and submit an application for the Section 1115 Medicaid Waiver under the current SMI/SED Demonstration Opportunity, and to include the policy points listed above that emphasize crisis stabilization services, opportunities for peers, and improved linkage between inpatient and outpatient services.

Sincerely,



Jessica Cruz, MPA/HS
Chief Executive Officer
NAMI California