



Maryland
Hospital Association

June 16, 2015

Tricia Roddy, Director
Department of Health & Mental Hygiene
201 West Preston Street – 2nd Floor
Baltimore, Maryland 21201-2301

Dear Ms. Roddy:

On behalf of the Maryland Hospital Association's (MHA) 65 member hospitals and health systems, we are pleased to support the state's application to amend its HealthChoice §1115 demonstration and allow Medicaid payments for services in Institutions for Mental Disease (IMDs). We understand that this request for an "IMD exclusion waiver" would target private IMDs treating individuals in need of either psychiatric or substance use care, and allow adults age 21 to 64 to continue to receive services in less-costly IMDs rather than general acute-care hospitals.

As you aware, on January 1, 2014 the state entered into a separate demonstration program with the Center for Medicare & Medicaid Innovation to revise Maryland's all-payer model and achieve the goals of the triple aim. To be successful, this model encourages Maryland's hospitals to work with their community partners to coordinate care and improve population health. Key to this effort is ensuring access to appropriate behavioral health services in both institutional and community-based settings. We believe that approval of your proposed IMD exclusion waiver will be a critical part of this broad-based population health improvement strategy.

If you have any questions, please don't hesitate to contact me at the association.

Sincerely,

Michael B. Robbins,
Senior Vice President