MedStar Health

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September 10, 2015

Ms. Victoria Wachino
Deputy Administrator and Director
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid
7500 Security Boulevard
Baltimore, MD 21244-1850

Dear Ms. Wachino:

On behalf of MedStar Health and its seven hospitals located in the State of Maryland, I am writing to urge your approval of the states' request for an amendment to Maryland's Section 1115 HealthChoice demonstration to provide Medicaid payments for stays in Institutions for Mental Disease (IMDs).

A waiver of the IMD exclusion will allow Maryland to reimburse IMDs for the treatment of Medicaid enrollees aged 21-64 in need of acute psychiatric and substance-use services. This would expand the scope of quality care available to Medicaid enrollees and allow the State to utilize cost-effective treatment options.

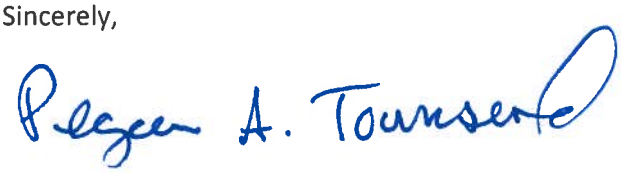
Due to the current IMD exclusion, many Medicaid enrollees with acute psychiatric and addiction treatment needs are referred to hospital emergency departments and general acute care inpatient units. These general acute care hospitals simply do not have the resources and expertise to provide the very specialized care these individuals need and deserve. In addition, there are certain unintended consequences in requiring general acute care hospitals to treat complex behavioral health patients, including:

- Decreased capacity for medical patients;
- Decreased capacity for low-and mid-range behavioral health patients;
- Force integration (due to space constraints) of behavioral health and medical patients;
- Longer wait times in hospital emergency departments;
- Longer lengths-of-stay in acute care hospitals for behavioral health patients; and
- Increased safety concerns for hospital staff and other patients.

For the above reasons MedStar Health urges approval of Maryland's request for a waiver from the IMD exclusion.

Thank you for the opportunity to comment and please do not hesitate to contact me if you need additional information.

Sincerely,



Pegeen A. Townsend
Vice President, Government Affairs
MedStar Health

cc: Maryland Congressional Delegation
Secretary Van Mitchell