



September 10, 2015

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

Dear Ms. Wachino:

I am submitting this letter in strong support of Maryland's request to amend its Medicaid §1115 HealthChoice demonstration to provide Medicaid payments for stays in Institutions of Mental Diseases (IMDs).

Health Care for the Homeless, Inc. (HCH) is a federally qualified health center (FQHC) providing a wide range of medical care, mental health services, social work and case management, addiction treatment, dental care, vision assistance, HIV services, outreach, and supportive housing to those without stable housing. In 2014, HCH served nearly 11,000 Marylanders at clinic sites in Baltimore City, Frederick, and Montgomery, Harford, and Baltimore Counties. The implementation of the Affordable Care Act's Medicaid expansion has allowed us to rapidly expand access to health insurance for our clients—moving from about 30% insured in 2013 to nearly 90% insured currently.

Given expanded Medicaid eligibility, we are now better-positioned to connect our clients to the broad range of specialty care services they need to address a myriad of complex health conditions, to include a critical need for community-based emergency psychiatric services and/or substance-use disorder services. Unfortunately, the IMD exclusion means that there are very long wait lists and we are unable to ensure access to timely treatment for a very vulnerable population. As you may already know, people experiencing homelessness have disproportionately high rates of mental health and substance use disorders, frequently seek care in emergency departments, and have higher total costs of care. At the same time, we are quite concerned about the increase in heroin and other opioid-related deaths in Maryland—a problem also endemic to a homeless patient population. Due to these factors, we hope CMS will approve Maryland's request for an IMD waiver as we believe it will increase access to care, improve health, lower costs, and reduce drug-related deaths.

Thank you for the opportunity to comment on Maryland's §1115 Waiver amendment. Should you wish to speak with me further about how Maryland's most vulnerable population would benefit from Medicaid payments in IMDs, please do not hesitate to contact me at 443-703-1301 or klindamood@hchmd.org.

Sincerely,

Kevin Lindamood, MSW
President & CEO

