



AMERICAN
PSYCHOLOGICAL
ASSOCIATION

November 18, 2016

Eliot Fishman
Director
State Demonstrations Group
Center for Medicaid and CHIP Services
Center for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

RE: New York Partnership Plan – Amendment to serve Incarcerated Individuals

Dear Mr. Fishman:

On behalf of the 117,500 members of the American Psychological Association (APA), I am writing to express our support for the New York State Department of Health's proposal to amend the State's 1115 waiver. This request seeks Medicaid matching funds for targeted services provided 30 days prior to release for a limited number of incarcerated individuals with serious behavioral and physical health conditions.

APA is the largest scientific and professional organization of psychologists in the United States. Comprising researchers, educators, clinicians, consultants, and students, APA works to advance psychology as a science, profession, and means of promoting health, education, and human welfare. The needs of those who would benefit from New York's amendment request—Medicaid-eligible, incarcerated individuals experiencing two or more chronic physical or behavioral conditions, serious mental illness, or HIV/AIDS—are a high priority for APA.

Many individuals' health needs are inadequately met until they become justice-involved, and too often, health gains or stability achieved during incarceration are not preserved after community reentry. APA believes that individuals should have their physical, mental, and behavioral health needs met in the community, prior to justice-involvement; however, as long as many Americans continue to be connected to these services through the justice system, it is critical to maintain any positive health outcomes realized while individuals are incarcerated. New York's 1115 waiver amendment request seeks to create an innovative set of practices aimed at this goal.

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Too many incarcerated individuals return to their communities without sufficient connection to the services they need, experience a significant relapse or worsening of symptoms, and then seek emergency services or even engage in criminal activity so that they will be placed in an institution mandated to provide care. New York hopes to create a health services bridge across the incarceration-community gap for this group, by providing care management and coordination, consultation with community providers, and certain medications that would promote clinical stability. The waiver would build on already existing efforts by New York to provide health services for individuals involved with the criminal justice system. Additionally, implementation of this approved New York waiver could serve as a model for other states that are seeking ways to provide transitional health services to justice-involved individuals with serious substance use disorder, mental health, and physical health needs.

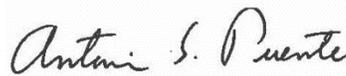
These proposed activities would be a wise use of federal matching funds. From our ongoing programmatic and advocacy efforts on these issues, we believe New York's request would make good policy, create better health outcomes for the reentry population, and produce financial savings in corrections and health care. Finally, because of a need for new strategies in working with this population, we would look forward to reviewing the evaluation of New York's efforts.

Thank you very much for the opportunity to comment on this waiver amendment request, and we strongly urge you to allow New York to proceed with their proposed efforts. If you have any questions or would like additional information, please contact Micah Haskell-Hoehl in our Public Interest Government Relations Office at 202.336.5935 or mhaskell-hoehl@apa.org.

Sincerely,



Susan H. McDaniel, PhD, ABPP
President



Antonio E. Puente, PhD
President-Elect