

IMD Waiver Application Letters of Support

Organization	Author(s)
University of Maryland School of Law Drug Policy and Health Strategies Clinic	Geraldine Doetzer Ellen Weber
National Council on Alcoholism & Drug Dependence – Maryland Chapter	Nancy Rosen-Cohen, Ph.D.
The Maryland Addiction Directors Group (multiple letters)	Lynn H. Albizo, J.D.
Baltimore City Substance Abuse Directorate	Vickie Walters
Hudson Health Services, Inc.	Leslie Brown
Community Behavioral Health Association of Maryland	Lori Doyle
Gaudenzia, Inc. (multiple letters)	Multiple Authors
Maryland Hospital Association	Michael B. Robbins
Johns Hopkins Medicine	Paul B. Rothman, M.D. Ronald R. Peterson
National Alliance on Mental Illness	Kate S. Farinholt, J.D. Jessica L. Honke, MSW
Hope House	Peter Dsouza
Mountain Manor	Marc Fishman, M.D.
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Adventist Healthcare	Kevin Young
Sheppard Pratt	Bonnie Katz
Maryland Association of County Health Officers	Gregory Wm. Branch, M.D., MBA, CPE

IMD Waiver Application Public Hearing Attendees

May 28, 2015 – Baltimore

- **Jinlene Chan:** Anne Arundel County Department of Health
- **Linda Forsyth:** Office of Senator Delores G. Kelly
- **Kaitlyn Shulman:** Department of Legislative Services
- **Geraldine Doetzer:** Drug Policy Clinic, University of Maryland School of Law
- **Chelsea Beaupre:** Johns Hopkins Medicine
- **Lori Doyle:** Community Behavioral Health Association of Maryland

June 3, 2015 – Annapolis

- **Delores G. Kelly:** Maryland Senate and Maryland Medicaid Advisory Committee Member
- **Catrina Scott:** Mountain Manor
- **Dan Martin:** Mental Health Association of Maryland
- **Craig Lippens:** Gaudenzia, Inc.
- **Nicki McCann:** Johns Hopkins Medicine
- **Japp Haynes**

SENATOR DELORES G. KELLEY
10th Legislative District
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Finance Committee

Chair

Property and Casualty Subcommittee

Vice Chair

Executive Nominations Committee

Joint Committee on

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Comments on DHMH Proposal to Seek an IMD Exclusion Waiver

For a decade, Maryland and nine other states had the enormous benefit of an Institutions for Mental Disease (IMD) Exclusion Waiver, when providing comprehensive treatment for adults suffering because of a severe mental health crisis. In 2006, CMS began phasing out the use of IMDs.

The impacted states, including Maryland, had acquired by that time a significant body of documentation that treatment provided for appropriate patients in IMDs was more cost-effective and more comprehensive than treatment offered in overcrowded general hospital emergency departments, therefore yielding better clinical outcomes, while saving tax dollars.

Now that Maryland is one of eleven states participating in an Affordable Care Act Medicaid Emergency Psychiatric Demonstration, Maryland is well placed to seek the new IMD Exclusion Waiver, which the Secretary of Health and Human Services has been directed to offer to states applying on behalf of patients needing comprehensive addiction treatment. Given that a large proportion of the chronically mentally ill also suffer with addictions, and given Maryland's move to integrated behavioral health modalities for these patients, the Maryland Department of Health and Mental Hygiene (DHMH) should definitely attempt to follow best practices by applying for the IMD Exclusion Waiver, a move that is most cost-effective for both the federal government and for the State.

Submitted on June 3, 2015
Delores G. Kelley
Member, Medicaid Advisory Council