



BOARD OF SUPERVISORS
COUNTY OF HUMBOLDT

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April 2, 2019

Jennifer Kent, Director
California Department of Health Care Services
1501 Capitol Avenue, MS 0000, P.O. Box 997413
Sacramento, CA 95899-7413

SUBJECT: Institutes for Mental Disease (IMD) Exclusion Waiver – Support

Dear Director Kent:

The Humboldt County Board of Supervisors encourages the Department of Health Care Services to pursue California's application for a waiver of the IMD exclusion for Medi-Cal mental health services.

For decades, the IMD exclusion has prohibited federal matching funds for services provided by counties to adults (ages 18 to 65) in hospitals, nursing homes or other inpatient care settings with more than 16 beds. Recently, the Center for Medicaid Services offered an opportunity to states to utilize Section 1115 waivers to receive federal Medicaid matching funds for short-term treatment in IMDs.

As you know, there continues to be an ongoing, acute shortage of psychiatric beds in our county and across the state. It is very difficult for psychiatric nursing facility operators to establish additional sites of 16 beds or fewer, due to the lack of economies of scale. An IMD exclusion waiver could increase the number and availability of psychiatric beds in California.

A significant portion of our county's 1991 Realignment dollars are utilized to pay for inpatient psychiatric and mental health rehabilitation center stays that are medically necessary, but not federally reimbursable. Waiving the IMD exclusion would allow counties to draw down federal funds for short-term stays, freeing up local funds for other critical community mental health and wellness services.

Thank you for considering this very important request.

Sincerely,

Rex Bohn, Chair
Humboldt County Board of Supervisors

RB:kh

cc: Brenda Grealish, Department of Health Care Services
 Farrah McDaid Ting, California State Association of Counties (CSAC)
 Shaw/Yoder/Antwith, Inc.