



**The
Providence
Center**

Peace of Mind in Community Care

Mental health
and substance
abuse care and
treatment services
for adults, children,
adolescents
and families

February 21, 2013

Elena Nicolella
Medicaid Director
Department of Human Services
Executive Office of Health & Human Services
Louis Pasteur Building
600 New London Avenue
Cranston, RI 02920

Dear Ms. Nicolella:

Thank you for the opportunity to comment on the State's Section 1115 Research and Demonstration Waiver Extension Request.

I offer these comments from my perspective as the Chief Executive Officer of The Providence Center, our state's largest community mental health center. As Rhode Island pursues the "triple aim" of better health, better healthcare, and lower costs, many of the most critical tools available will be in the area of behavioral health. Some research indicates that when one looks at total healthcare spending, nearly 50% of total costs are incurred by 5% of the population. Many of these individuals have co-occurring behavioral health; substance abuse; and chronic physical health conditions. The interactions of these conditions too often cause individuals to delay entering care. The resulting treatment is complicated and, very often, the resulting improvement in health status is not very long lasting because these individuals often lack the social supports many of us take for granted.

Overall, we applaud your Department's efforts through the Waiver to make services and supports available and accessible to these high-intensity, high cost individuals in the most flexible way possible. Based on The Providence Center's experience serving these populations, we believe strongly that if provided with the right treatment and support at the right time, the overwhelming majority of people can and do recover. We believe agencies like

ours can work in partnership with state government to improve outcomes for individuals requiring complex care and save the state significant budget resources over time. These resources can then be re-invested in developing an integrated behavioral health/primary care system that can make preventive care available to all Rhode Islanders.

There is much in this Waiver Extension request that represents positive movement in this strategic direction. Specifically:

- We would look forward to working with your office and others to explore how behavioral health services can be more fully integrated into The Rhode Health Partner and Connect Care Choice managed care programs and collaborating with a variety of stakeholders to ensure that behavioral health is incorporated into patient-centered medical homes programs.
- We strongly support the waiver of the Institutions of Mental Disease (IMD) Exclusion that too often in our state serves as an obstacle to people with Medicaid coverage getting the care they need. Eliminating the IMD exclusion in Rhode Island also will encourage hospitals to become partners in developing new programs that can serve the full range of Rhode Islanders in need of mental health and substance abuse services.
- We encourage the departments of EOHHS to fully develop and implement plans for peer specialists/peer navigators who can assist enrollees in navigating the healthcare system. The requirement to apply for eligibility for a variety of programs and supports through Rhode Island's health insurance exchange will be a new and challenging step for many individuals with mental health and substance abuse issues. Skilled, understanding assistance will be critical to ensuring that these people do not get lost in the new system.
- As you know, The Providence Center has been very active in exploring the Sobering Treatment Opportunity program (STOP) and efforts to pilot this kind of program in the city of Providence. We support your efforts to seek authorization to use Medicaid resources to support this kind of program for eligible clients. We are working with other groups to secure other funding to support the full costs of this program.
- We appreciate the Request's emphasis on providing Medicaid eligible clients with appropriate community support services, especially stable housing. In The Providence Center's experience, medical or behavioral health interventions can have insignificant effects without a comprehensive set of services delivered in a client's home. With the Affordable Care Act's Medicaid expansion coming soon, many homeless individuals will become eligible for Medicaid coverage. Comprehensive services will be critical in preventing these individuals from utilizing expensive care accessed in emergency rooms and other high-cost settings.
- The Providence Center supports EOHHS' measured approach to implementation of managed care approaches for "dual eligibles." We believe strongly that such a program has strong potential for strengthening supports and improving outcomes for the "dual eligibles" we serve, but believe that services and supports for people with mental illness may need to be crafted differently than those for individuals with other conditions. -To

the degree possible, these services and supports and the outcome expectations of the program should be complementary to Rhode Island's Health Homes program.

- We strongly support the proposed extension of Health Homes Enhanced FMAP. The originally-approved eight quarters of FMAP is too brief a period within which to implement and measure the outcomes of a complicated program for a complex population. We have data that indicates that The Providence Center's implementation of this program has demonstrated important, positive outcomes for the clients we serve. We look forward to additional time with which to produce a full set of outcome measures, compare outcomes and approaches with our sister agencies, and refine the program's approach.

There is one area we would like to recommend that EOHHS consider including in the Extension Request. For the last two years, The Providence Center has worked to implement a program of recovery support services called Anchor Recovery Community Centers. We opened the first center in Pawtucket and the second last month in Warwick. These are community centers where individuals in recovery from substance abuse can find supports of all sorts, reconnect with their families and neighborhoods, and build an inclusive community of support for themselves. Some services available through Anchor will be reimbursable through other programs covered by the Extension Request, (for example, peer counseling, substance abuse counseling, and finding housing). We would urge you however to consider adding Recovery Support Services to the list of programs covered under the waiver of comparability (page 25 of the draft Waiver Extension request). We would welcome discussions with EOHHS to develop a reimbursement mechanism connected to Medicaid beneficiaries active participation in services like those offered at the Anchor Recovery Community Centers.

Thank you for your efforts to ensure that Rhode Island's 1115 Waiver supports the health and well-being of the broadest range of eligible participants. On behalf of The Providence Center and our state's behavioral health community, we appreciate your efforts.

Sincerely,

A handwritten signature in cursive script that reads "Dale K. Klatzker" followed by a small mark that looks like "con>".

Dale K. Klatzker, Ph.D.
President and CEO