



900 17th Street, NW, Suite 420
Washington, DC 20006-2507
Phone: 202-393-6700
Fax: 202-783-6041
naphs@naphs.org
www.naphs.org

VIA EMAIL: MedicareMedicaidCoordination@cms.hhs.gov

March 19, 2012

Ms. Marilyn Tavenner
Acting Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Room 445-G, Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

Dear Ms. Tavenner,

The National Association of Psychiatric Health Systems (NAPHS) appreciates the opportunity to comment on the demonstrations that have been announced to test new models for coordinating care for individuals who are enrolled in both the Medicare and Medicaid programs (individuals known as “dual eligibles”).

Massachusetts is the first state to have formally submitted a capitated financial alignment demonstration proposal to the Centers for Medicare & Medicaid Services (CMS). CMS has provided a 30-day comment period at www.integratedcareresourcecenter.com/icmstateproposals.aspx for all interested parties to offer their insight into these formally submitted demonstration proposals. We understand that CMS will review these comments as part of their evaluation process of each of the state-submitted demonstration proposals.

ABOUT NAPHS

Founded in 1933, NAPHS advocates for behavioral health and represents provider systems that are committed to the delivery of responsive, accountable, and clinically effective prevention, treatment, and care for children, adolescents, adults, and older adults with mental and substance use disorders. Our members are behavioral healthcare provider organizations, including more than 700 psychiatric hospitals, addiction treatment facilities, general hospital psychiatric and addiction treatment units, residential treatment centers, youth services organizations, outpatient networks, and other providers of care. Our members deliver all levels of care, including inpatient treatment, residential treatment, partial hospitalization, and outpatient services.

As behavioral healthcare providers, we care for millions of individuals with serious and persistent mental illnesses and serious addictive disorders, many of whom are enrolled in both the Medicare and Medicaid programs. For example, according to MedPAC, 56% of all Medicare inpatient psychiatric facility patients nationwide are dual eligibles (that is, enrolled in both the Medicare and Medicaid programs). Some 79% of these patients are under 65 years old, and 40% are under 45 years old. The typical diagnosis is psychosis, and many of these patients also have medical comorbidities.

A FOCUS ON BEHAVIORAL HEALTH ISSUES IS IMPORTANT TO THE SUCCESS OF DUAL-ELIGIBLE DEMONSTRATIONS.

From our perspective as a national association representing more than 700 behavioral healthcare facilities across the country, we would like to outline broad patient protection themes (including voluntary enrollment, network adequacy, adequate financing and payment, and reasonable timelines to meet stated

-continued-

Page 2 -- NAPHS

goals) that we believe all of state demonstration proposals – including the demonstration in Massachusetts – should include. Our comments are included in the attached briefing paper (“Comments on Dual Eligible Demonstrations: The Importance of Adequately Addressing Behavioral Health Issues in Demonstration Design and Evaluation”).

The briefing paper also provides insight into some of the specific issues and challenges related to meeting the needs of individuals with mental and addictive disorders. Behavioral disorders disproportionately affect the dual eligible population, and we believe that mechanisms need to be in place to ensure that demonstrations adequately support their needs.

NAPHS IS A RESOURCE ON BEHAVIORAL HEALTH ISSUES.

The National Association of Psychiatric Health Systems is committed to being a resource to all states, CMS, and health plans on the population that our members have devoted their lives to serving – individuals with serious psychiatric and addictive disorders.

We would be happy to meet with policymakers, to connect you with behavioral health experts, and to arrange for tours of existing programs to help provide a more in-depth picture of the special needs of this population.

We share your goal of improving coordination for dual eligibles, and we look forward to working with you to ensure that the focus remains on better care and coordination overall.

Sincerely,



Mark Covall
President/CEO

Attachment: NAPHS statement on dual-eligible demonstrations