SECTION 1115 INSTITUTIONS FOR MENTAL DISEASE WAIVER

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PURPOSE OF IMD WAIVERS

- Historically, federal regulations have prohibited Medicaid reimbursement for adult stays in facilities considered to be Institutions for Mental Disease, or IMDs.

- IMDs refer to facilities that primarily provide diagnosis, treatment or care to persons with behavioral health needs and have more than 16 beds.

- Through submission of a Section 1115 demonstration waiver of the IMD exclusion (IMD waiver), states can request Medicaid reimbursement for services provided in IMDs.

- States must show how coverage of these services will complement, but not replace, provision of services in less restrictive settings.
States can pursue an IMD waiver for mental health or substance use disorder treatment services.

Oklahoma’s IMD waiver application includes both categories of services through a joint Serious Mental Illness and Substance Use Disorder waiver.

The waiver will be effective for five years, if approved.

Oklahoma’s requested effective date is Oct. 1, 2020.
INCLUDED POPULATIONS AND SERVICES

Inpatient stays in psychiatric hospitals (with more than 16 beds).
  • Adults ages 21-64.

Crisis stabilization services in crisis units (with more than 16 beds).
  • Adults ages 21-64.

Substance use disorder treatment in residential settings.
  • Adults ages 21-64.
  • Individuals under 21 years old.
Qualified Residential Treatment Programs

• While not currently implemented in the state, it is anticipated that congregate care facilities for children in state custody will be transitioned to QRTPs.

• Such facilities that qualify as IMDs will be covered under the waiver.

Medicaid Expansion Population

• The state is pursuing Medicaid expansion prior to the effective date of the IMD waiver.

• Newly eligible adults covered through Medicaid expansion, will be covered within the IMD waiver if they receive included services.
WAIVER REQUIREMENTS

- Length of stay
  - An average length of stay of 30 days is required for all covered stays.
  - For inpatient psychiatric stays, Medicaid reimbursement will not be provided for stays that exceed 60 days.

- National accreditation
  - Residential SUD providers will be required to obtain accreditation from the Joint Commission, the Commission on Accreditation of Rehabilitation Facilities or the Council on Accreditation.

- Provision of Medication Assisted Treatment
  - Residential SUD providers will be required to provide MAT or have a relationship with a MAT provider.
GOALS OF THE WAIVER

Overarching goals for SUD include:

• Increased engagement in and adherence to treatment.
• Reduction in overdose deaths.
• Reduced utilization of emergency departments or hospital settings.
• Reduced readmissions to the same or higher levels of care.
• Improved access to care for physical health conditions.
GOALS OF THE WAIVER

Overarching goals for SMI include:

• Reduced utilization of emergency departments for beneficiaries with SMI awaiting mental health treatment.

• Reduced preventable readmissions to acute care hospitals.

• Improved availability of crisis stabilization services and community-based services.

• Improved care coordination.
Presented in partnership by the Oklahoma Health Care Authority and the Oklahoma Department of Mental Health and Substance Abuse Services.