

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.



OVERVIEW OF OKLAHOMA'S IMD WAIVER

- 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.



INCLUDED POPULATIONS AND SERVICES (CONTINUED)

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 Q RTPs.
- 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.



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