

April, 30, 2021

Department of Health Care Services
Director's Office
Attn: Angeli Lee and Amanda Font
P.O. Box 997413, MS 0000
Sacramento, California 95899-7413



RE: CalAIM Section 1115 & 1915(b) Waivers

Dear Ms Lee and Ms Font:

On behalf of Hope Street Coalition, a grass-roots advocacy organization focusing on the intersection of homelessness, mental illness, and addiction, I am writing to express the concern of our members about the Medicaid section 1115 Demonstration draft that was recently released for public comment. Our members are deeply discouraged that the Draft fails to include language requesting Section 1115 demonstration authority to provide residential treatment services in Institutions of Mental Diseases (IMDs) for adults with serious mental illness (SMI) and children with serious emotional disturbances (SEDs).

Hope Street Coalition recognizes that the Draft includes a short paragraph stating the intention of DHCS to request this authority no sooner than July 1, 2022. While there is merit in implementing necessary payment and data collection reforms as pre-cursors to IMD Exclusion waiver for SMI and SED, the lack of language detailing how this authority might increase care and services to those currently suffering from untreated serious mental illness and be integrated in the larger demonstration does not inspire confidence in DHCS' commitment to this important issue. Moreover, every year the demand for treatment of SMI by those experiencing homelessness increases and any delay increases the suffering on the streets.

Hope Street Coalition recommends that the paragraph on Page 17 entitled "Anticipated Future Demonstration Request" be expanded and include details as to how the waiver would serve the unhoused mentally ill in creating additional treatment and housing options, how the waiver will add to psychiatric bed capacity and increase the provision of residential treatment, and the benefits to the State and counties in creating increased psychiatric and recovery capacity in reducing behavioral health costs and other costs associated with untreated serious mental illness, particularly among those experiencing homelessness.

Thank you for the opportunity to provide public comment on this significant reform. Please contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul C. Webster".

Paul C. Webster
Director
Hope Street Coalition