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Addiction Medicine

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June 13, 2017

The Honorable Brian Fitzpatrick  
United States House of Representatives  
514 Cannon House Office Building  
Washington D.C. 20515

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Dear Representative Fitzpatrick,

On behalf of the American Society of Addiction Medicine (ASAM), the nation's oldest and largest medical specialty society representing more than 4,300 physicians and allied health professionals who specialize in the treatment of addiction, I am writing to offer our support for your bill, the Removing Barriers to Medicaid and CHIP Addiction Treatment Act, which would lift the Medicaid Institutions for Mental Diseases (IMD) exclusion for mental health and substance use disorder residential treatment facilities.

ASAM has long contended that the repeal of the IMD exclusion is essential for ensuring access to medically necessary non-hospital-based acute care and extended care residential services to treat addiction. The IMD exclusion is a statutory provision enacted in 1965 at the creation of Medicaid. The exclusion was created to avoid burdening Medicaid with financing care in large non-federal facilities and to avoid having federal dollars pay for long-term treatment or "warehousing" of patients with mental disorders in state hospitals or nursing homes. At its inception, the IMD exclusion was well intended, but as evidence-based treatment for addiction has progressed and become available, the provision now serves as a major obstacle for patients by denying coverage for treatment except in hospitals with fewer than 16 psychiatric beds. This prevents the treatment of patients using Medicaid dollars in cost-effective public or private specialty facilities that have evolved using the levels of care detailed in *The ASAM Criteria; Treatment Criteria for Addictive, Substance-Related, and Co-Occurring Conditions*.

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In addition to repealing the IMD exclusion, your legislation will also mandate periodic review of ongoing need for mental health and SUD treatment and institutes accreditation standards for residential facilities that offer mental health and SUD treatment. It is imperative that the assessment criteria to review ongoing need for treatment and the accreditation standards use evidence-based metrics that are proven to improve patient care. Thus, ASAM strongly recommends that all assessment criteria and accreditation standards align with the ASAM Criteria levels of care. In addition, we also recommend that any accreditation standards require residential treatment centers to offer medications for the treatment of opioid use disorder. We believe that these recommendations will strengthen your legislation and help ensure that treatment facilities are providing evidence-based, patient-centered care.

ASAM thanks you for your leadership on this important issue. Repealing the IMD exclusion is critical to improving access to addiction treatment and we are pleased to endorse your legislation. We look forward to working closely with you as your legislation moves through Congress.

Sincerely,

Kelly Clark, MD, MBA, DFASAM  
President, American Society of Addiction Medicine