



**American Hospital
Association**

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Submitted electronically

May 3, 2011

Donald M. Berwick, M.D., MPP
Administrator
Centers for Medicare & Medicaid Services
Hubert H. Humphrey Building
200 Independence Avenue, S.W., Room 445-G
Washington, DC 20201

***RE: Document Identifier: CMS-10382 / Billing Code 4120-01-P: Emergency Clearance:
Public Information Collection Requirements Submitted to the Office of Management and
Budget (OMB) – New Collection: Title of Information Collection: Medicaid Emergency
Psychiatric Demonstration***

Dear Dr. Berwick:

On behalf of our more than 5,000 member hospitals, health systems and other health care organizations, which include more than 1,300 behavioral health care providers, as well as our 40,000 individual members, the American Hospital Association (AHA) appreciates the opportunity to comment on the Centers for Medicare & Medicaid Services' (CMS) request for emergency clearance for the Medicaid Emergency Psychiatric Demonstration authorized by the *Patient Protection and Affordable Care Act of 2010 (ACA)*.

The AHA supports Section 2707 of the ACA, which establishes a three-year demonstration project to study allowing Medicaid payment for the inpatient stabilization of individuals with serious mental health-related problems to facilities otherwise prohibited from treating such patients by the current Medicaid law exclusion for institutions for mental diseases. Non-governmental, freestanding psychiatric hospitals fall within this exclusion. Allowing coverage for inpatient admission for emergency psychiatric treatment in non-governmental, freestanding psychiatric hospitals will improve access to and quality of care for psychiatric patients while reducing overcrowding in many community hospital emergency departments. The AHA believes strongly in getting patients the right care in the right setting, at the right time. The Medicaid emergency psychiatric demonstration project is a good example of where a change in public policy can lead to better care and, hopefully, better outcomes.



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The AHA supports CMS' efforts to meet the requirements necessary to implement the Medicaid Emergency Psychiatric Demonstration, as authorized in the ACA. And we support CMS' request for emergency clearance to allow the demonstration project to move forward.

We look forward to working with CMS to ensure that this important demonstration project is implemented. If you have questions about our comments, please contact Molly Collins Offner, AHA director of policy, at mcollins@aha.org or (202) 626-2326.

Sincerely,

/s/

Linda E. Fishman

Senior Vice President for Public Policy Analysis and Development