

June 9, 2022

Re: Comments on Fairview/Acadia Psychiatric Hospital

Dear MDH Division of Health Policy Colleagues,

Thank you for soliciting public input on the establishment of a new 144-licensed bed freestanding mental health hospital in Saint Paul, Ramsey County by a partnership between M Health Fairview and Acadia Healthcare. The Office of Ombudsman for Mental Health and Developmental Disabilities submits this letter to express our concerns about this project.

Like many in the mental health community, we realize that there is a critical need to expand the availability of inpatient mental health care in Minnesota. However, this particular proposal is problematic for a handful of reasons. Building a stand-alone hospital for providing inpatient mental health care that does not also include an emergency department greatly limits the functionality and accessibility of the facility. Emergency rooms are a frequent entry point for people experiencing serious mental health symptoms to obtain inpatient care.

People requiring inpatient mental health care also often have coexisting or other conditions also requiring care. A facility that does not provide other medical care and services will be unable to serve people with other care needs. It is unrealistic and inefficient to try to compartmentalize and separate physical from mental health care needs. If Minnesota is going to approve an exception to the existing moratorium, we should do so for a facility that can provide quality inpatient mental health care while also accommodating the medical /physical care needs of a diverse client population.

Finally, as others have noted, without an IMD Exclusion waiver, Medicaid cannot pay for mental health care in a stand-alone psychiatric facility with more than 16 beds. If Medicaid is not a viable funding source for the services provided in this facility, then many of the people who most need the care that this facility could provide will be unable to get it.

We appreciate the focus on the serious gaps in our mental health services system. However, we urge a cautious and comprehensive approach. Building a facility that is overly restricted in the care needs it can address would be a missed opportunity. We hope that this process will

take as broadly inclusive a view of client populations and needs as possible to do the most good.

Sincerely,

Barnett (Bud) Rosenfield
Ombudsman

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