



1108 Lavaca Street, Suite 700, Austin, Texas 78701
512/465-1000
www.tha.org

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*Via electronic submission to:
RAD_1115_Waiver_Finance@hhsc.state.tx.us*

PUBLIC COMMENT LETTER

Texas Health and Human Services Commission
Mail Code 1000
P.O. Box 13247
Austin, Texas 78711-3247

Re: Comments on Proposed Amendment to the Uniform Hospital Rate Increase Program Rule

On behalf of our more than 450 member hospitals and health systems, including rural, urban, children's, teaching and specialty hospitals, the Texas Hospital Association appreciates the opportunity to provide comments on the proposed amendments to the rule concerning the Uniform Hospital Rate Increase Program.

THA supports the Texas Health and Human Services Commission's proposed rule to permit institutions for mental disease to participate as an eligible hospital class for rate increases under UHRIP. Access to behavioral health care is critical for the state, especially in responding to the current public health disaster. Currently, there are not enough inpatient beds for emergency psychiatric care, and access to community-based services is insufficient to meet the state's demand.

THA supports increasing reimbursement for behavioral health services to bring payment closer to the actual cost of providing care. Adding IMDs to the UHRIP program is an important step toward this goal. However, the rule as proposed limits the rate increases for IMDs to patients under age 21 or over age 65, excluding services for adult Medicaid patients. THA understands HHSC must adhere to CMS actuarial requirements related to IMDs and their costs for this population. THA requests that HHSC work with CMS to determine an appropriate way to capture this population in UHRIP. Furthermore, THA supports HHSC's efforts to bolster community-based services and to seek a waiver to the IMD exception to allow reimbursement for inpatient psychiatric stays of longer than 15 days for Medicaid clients ages 21-64.

Thank you for your consideration of these comments. Should you have any questions, please do not hesitate to contact me at sgonzalez@tha.org or 512/465-1596.

Respectfully submitted,

Sara Gonzalez
Vice President of Advocacy & Public Policy
Texas Hospital Association