

April 6, 2026

Division Director
Michigan Department of Health and Human Services
Access Standard, Service Array & Policy Division
Bureau of Children's Coordinated Health Policy and Supports

Re: 2553-BCCHPS - Reimbursement of Specialty Behavioral Health Services Based Upon Location of Services

Dear Phillip Kurdunowicz:

On behalf of Michigan's 129 community hospitals, the Michigan Health & Hospital Association (MHA) appreciates the opportunity to comment on the Michigan Department of Health and Human Services proposed policy related to specialty behavioral health services. The MHA is the statewide membership organization representing all community hospitals in Michigan. Membership ranges from critical access hospitals in rural areas of the Upper Peninsula to large, urban tertiary care centers in the heart of Detroit, and everything in between. Our mission is to advance the health of individuals and communities.

III. Coverage of Services in Nursing Facilities

Most of the services listed in this section codify current practice, however there are several additional service types missing that would support care for this patient population. That includes group therapy, supports coordination and medication review; all of which are included in the CCI I/DD service list.

Please confirm whether any additional services beyond the six listed in this policy would be allowable, and as a covered service.

IV. Coverage of Services in Institutions for Mental Diseases

While the language in section IV largely reiterates current policy, it would be helpful to understand **why there is a distinction between the allowable length of stay for a patient with a serious mental illness (SMI) and those with a substance use disorder (SUD)**. This distinction may have the potential to create inequitable treatment for patients within the same facility.

Further, **please clarify whether Medicaid will only cover IMD stays for SUD patients if their stay exceeds 15 days**, or if all IMD stays for SUD patients are covered, regardless of length.

V. Coverage of Services in Child Caring Institutions

Section V(A) describes that Medicaid will not cover services for children with serious emotional disturbances (SED) in a Child Caring Institution (CCI) unless the CCI is licensed as a 'children's therapeutic group home'. **Please clarify whether Medicaid would cover services delivered in a CCI without the 'children's therapeutic group home' designation for children with a diagnosis other than SED.**

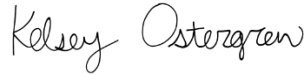
Section V(B) states that services for children with an I/DD may be reimbursed in a CCI only if it exclusively serves an I/DD population. **Can you please provide context on why Medicaid would not reimburse services for children with an I/DD in settings that serve mixed diagnosis, such as a children's therapeutic group home?**

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Brian Peters, Chief Executive Officer

Thank you for the opportunity to comment. MHA remains committed to expanding access to specialty behavioral health services in a way that allows patients to receive timely and appropriate care in the most suitable care setting. MHA is available to discuss any of these comments further and look forward to continued partnership with MDHHS on the topic. Please contact MHA Director, Health Policy Initiatives, Kelsey Ostergren at kostergren@mha.org, with additional questions.

Sincerely,

A handwritten signature in black ink that reads "Kelsey Ostergren". The signature is written in a cursive, flowing style.

Kelsey P. Ostergren
Director, Health Policy Initiatives
Michigan Health & Hospital Association