

Niki Feller, LMSW  
Lenawee Community Mental Health Authority  
1040 S. Winter St. Suite 1022  
Adrian, MI 49221

Dear House Health Policy Committee Members,

My name is Niki Feller and I am employed by the Lenawee Community Mental Health Authority (LCMHA) as the Chief Clinical Officer. I have been employed in the Community Mental Health (CMH) field for 31 years; specifically with LCMHA since 2018. I am writing in representation of my position as well as that of LCMHA.

The Lenawee Community Mental Health Authority strongly urges your opposition of the proposed *House Bill 6355: A bill to amend 1974 PA 258, entitled, "Mental Health Code"*. The addition of subsection (4), to allow "a clinically qualified individual" to complete a pre-admission screening for the hospital would negatively affect the inpatient hospitalization rate. It is important to note that the CMH system is based on the philosophy of least restrictive treatment and leveraging our knowledge of the individuals we serve and the supports available to ensure that inpatient hospitalization is a last resort and determined medically necessary. Hospital systems tend to operate from a risk aversion standpoint, particularly in behavioral health areas, where approving a known level of inpatient care reduces liability to the hospital system. As many hospital systems also have their own psychiatric inpatient units, authorizing inpatient psychiatric treatment would create a conflict of interest for these hospitals. Therefore, this bill would likely increase inpatient psychiatric referrals to inpatient beds that already cannot meet capacity.

The intent to reduce emergency room wait times for psychiatric inpatient placement is worthy of legislative action, however, this proposed bill fails to address any issues that would impact this outcome. With the statewide CMH system consistently exceeding the State of Michigan standards in this area, completing pre-admission screenings with 3 hours 98% of the time, this issue is clearly not the barrier to timely inpatient placement. In my 31 years of service, I have leadership experience with inpatient pre-admission screenings in Jackson, Hillsdale, and Lenawee counties. This experience includes partnerships with multiple emergency rooms, their staff and physicians. I have witnessed the reduction in available inpatient psychiatric beds as well as the increasing denial of referrals who are deemed "too acute" which has led to the increase in wait times to access this service. I have also witnessed an increase in individuals considered "too acute" for inpatient beds, later being released from the emergency rooms without the needed treatment as all options had been exhausted. It is my opinion that these are the issues underlying the long emergency room stays and should be the focus of legislative action.

We urge your opposition of House Bill 6355 so that the CMH system can continue to provide conflict free pre-admission screenings and ensure least restrictive treatment for the individuals we serve. Thank you for your consideration in this matter.

Sincerely,

Niki Feller, LMSW