TOUCHSTONE
mental health

2312 Snelling Avenue
Minneapolis, MN 55404
touchstonemh.org

3/18/2026

Dear Chair and Members of the Committee,

On behalf of Touchstone Mental Health, I am writing to express strong support for the proposed legislation amending Minnesota Statutes sections 144A.351 and 245D.12 and establishing the Integrated Community Supports (ICS) Program Integrity and Sustainability Work Group.

This proposal represents a thoughtful, balanced, and urgently needed step toward strengthening Minnesota's Integrated Community Supports system while maintaining access to high-quality, community-based services for individuals with complex mental health and disability-related needs.

First, the addition of timely, transparent reporting on ICS capacity and utilization is a critical improvement. Requiring regular updates on bed availability, occupancy, provider capacity, and licensing activity are necessary to identify gaps, address inequities in access, and ensure that services remain aligned with community need across the state.

Second, the clarification and standardization of setting capacity reporting requirements will promote consistency and accountability across providers. Clear expectations and publicly available criteria from the Department of Human Services will reduce confusion, improve compliance with home and community-based services standards, and support providers in developing settings that are both person-centered and fully integrated.

Third, the establishment of the ICS Program Integrity and Sustainability Work Group is the most necessary element of this proposal. Bringing together state agencies, counties, providers, individuals receiving services, families, advocates, and housing partners ensures that future policy decisions will be informed by those with direct experience and expertise. The scope of the work group—spanning rate structures, licensing processes, prior authorization, service engagement, and housing considerations—appropriately reflects the complexity of the ICS system.

Importantly, this legislation recognizes that sustainable reform must be data-driven and collaborative. By requiring the state to provide utilization, expenditure, and compliance data, and by directing the work group to develop actionable recommendations with fiscal analysis, this proposal sets the stage for meaningful, informed improvements rather than reactive or fragmented changes.

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Finally, the provision pausing significant changes to ICS rates and licensing processes until the work group has completed its work is both prudent and necessary. Providers and the individuals they serve depend on system stability. This pause ensures that any future changes are deliberate, coordinated, and grounded in a comprehensive understanding of system impacts.

At Touchstone Mental Health, we see the impact of Integrated Community Supports every day through our programming at Rising Cedar Apartments and Kyle Garden Square. In these settings, we serve individuals living with serious mental illness, many of whom also have histories of homelessness. ICS services are essential in helping people not only obtain housing, but maintain it, build stability, and reconnect with their communities. Through individualized, on-site support, residents develop daily living skills, manage their mental health, and reduce reliance on more restrictive or costly levels of care. Just as importantly, ICS creates a pathway for true community integration by supporting individuals to live in their own homes, build relationships, and pursue meaningful goals. These services are a critical component of Minnesota's continuum of care and a proven model for promoting both housing stability and recovery.

Integrated Community Supports play a vital role in helping individuals live in the least restrictive, most integrated settings possible. This legislation strengthens oversight and accountability while preserving access and fostering thoughtful system evolution. It reflects a commitment to both program integrity and person-centered supports.

Thank you for your leadership and for the opportunity to provide input. I strongly urge your support for this proposal.

Sincerely,

Chris Westergaard
Vice President of Clinical Services
Touchstone Mental Health