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November 2nd, 2022

Stoyan Bumbalov, Managing Director
State Building Code Council
Washington State Department of Enterprise Services
1500 Jefferson St SE
Olympia, WA 98501

RE: Request for Emergency Rule
Adoption of the R-4 Occupancy Group in 2018 IBC and 2018 IFC

Dear Director Bumbalov,

As the Director of Public Policy at NAMI in Washington, I am an advocate for mental health services for the residents of Washington. I understand the importance of aligning policies and regulations that meet the needs of our residents. Access to mental health services is in a state of crisis, with 33.5% of adults in Washington reporting symptoms of depression and anxiety as recently as 2021. With the economic impact of the pandemic, this number has consistently increased over the past 2 years. The current mental health service continuum in Washington has significant gaps, including the need for residential level community based treatment.

The emergency enactment of R-4 allows for organizations such as AMFM Healthcare, Newport Healthcare, and Ryther to provide services the state desperately needs to meet the growing demand for services. Both organizations, along with many others have been navigating the licensure process, however are at a halt due to the current building code not addressing residential treatment for individuals between 6-16 beds. Washington is the only state that has not adopted R-4 from the international building code; the impact of that exclusion exacerbates the lack of services being provided at the residential level in Washington state.

The residents of Washington are either not obtaining the care at the appropriate clinically indicated level, or are forced to travel out of state to receive services, which is an undue burden on struggling families. Early intervention for those experiencing mental health crises is proven to decrease utilization of emergency and higher levels of care such as crisis stabilization or in-patient hospitalization. Residential care in a small group home setting also has proven positive outcomes which substantially impact the trajectory of an individual's quality of life and reliance on emergency services. On behalf of myself and NAMI- Washington, we support the Department of Health's proposal for the emergency adoption of R-4 Occupancy Group in the 2018 IBC and 2018 IFC.

Thank you for your time and consideration,



Anna Nepomuceno
Director of Public Policy
NAMI Washington