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Butte-Silver Bow Health Department

25 W. Front St., Butte, MT 59701-2801
(406) 497-5020 Fax: (406) 497-5096
<http://www.co.silverbow.mt.us/135/Health>
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SEP 01 2015
HEALTH RESOURCES
DIVISION

Sept. 2, 2015

Jo Thompson
Montana Department of Public Health and Human Services
P.O. Box 202951
Helena, MT 59620-2951

Re: Comments, Montana Health and Economic Livelihood Partnership (HELP) Program Section 1115 Research and Demonstration Waiver Application

Ms. Thompson:

The Butte-Silver Bow Board of Health appreciates this opportunity to comment on the draft application for the Health and Economic Livelihood Partnership (HELP) Act. The board believes enacting Medicaid expansion is a top priority, because access to healthcare is a critical component of the overall health of our population, both here in Butte-Silver Bow and statewide.

It was tremendous to witness earlier this year in Montana the bi-partisan support generated toward Montana Senate Bill 405. Great support also came from the business community, healthcare providers and from uninsured residents who relayed to state legislators how their lives have been impacted by having no healthcare coverage. The Butte-Silver Bow Health Department very much supports approval of the draft 1115 waiver through CMS, and the department stands ready to assist in the enrollment process, once Medicaid is expanded.

The Medicaid expansion will greatly assist the residents of Butte-Silver Bow. Currently, 24 percent of the county's residents under age 65 are uninsured, while 9 percent of our county's children are uninsured. Sixteen percent of adults in Butte-Silver Bow report they could not see a doctor in the past 12 months because of cost.

The Butte-Silver Bow Board of Health requests that the Montana Department of Public Health and Human Services act quickly to apply for the federal waiver and then implement Medicaid expansion. We very much support DPHHS as it moves forward with expansion implementation, and we ask the department to collaborate with our public health department to actively reach out to potential new enrollees.

Should you need further information about this issue, please contact Butte-Silver Bow Health Officer Karen Sullivan at 406-497-5003 or ksullivan@bsb.mt.gov. Thank you for your time and attention.

Sincerely,

Danette Melvin
Chair
Butte-Silver Bow Board of Health

Thompson, Jo

From: Jacquie Helt <Jacquie.Helt@seiu775.org>
Sent: Monday, September 07, 2015 9:46 PM
To: Thompson, Jo
Subject: Med Expansion Public Comment III
Attachments: Mathew Jackson.docx

Jacquie Helt
Montana State Director
SEIU 775

Phone: 406-544-9682

#Fightfor15 #homecare15 #lowpayisnotok

186
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Thompson, Jo

From: emarum@montanaorganizingproject.org
Sent: Monday, September 07, 2015 10:49 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Elizabeth Marum

Email: emarum@montanaorganizingproject.org

Comments: I fully support the HELP Act for three reasons: 1) It helps disabled people and allows them greater access to healthcare benefits that help them lead a meaningful life. Much of this is health care treatment that would be either too expensive for them to afford on disability income. People with disabilities can still add value to our society and work in meaningful ways if their disabilities can be managed. Medicaid would allow that. 2) It also allows people to have access to healthcare while they are in the queue to qualify for full Medicare. There is a two year waiting period once someone is eligible for disability payments, yet they are not eligible for Medicare due to the waiting period. I've met people in Montana -- veterans of the war in Iraq and Afghanistan -- who were a few hours or days shy of full VA health care and had no access to needed treatment though their injuries required ongoing treatment and care. It breaks my heart that we would allow this to happen. The HELP Act will provide a bridge to treatment for people who need and deserve it. 3) The HELP Act helps our Native American Montanans by funding IHS services at the higher Medicaid rate. IHS has the lowest per-capita payment of any federally funded healthcare -- lower even than the Dept of Corrections which is known for its skimpy healthcare budget. IHS has a per-cap of less than half of the Dept of Corrections. By treaty, we are obligated to supply health care treatment to the tribes. The IHS is chronically underfunded, perhaps criminally underfunded. As an example, auto-immune disorders related to chronic poverty are on the rise on Crow Reservation where the live expectancy is 20 years less than the average Montana population. The tribes deserve better health care and greater access to healthcare. While others complain about the low Medicaid repayment rates, those same rates look good to the IHS. For this reason, Medicaid is good for Indian Country. Thank you for taking these points into consideration and swiftly enacting the HELP Act in Montana by the first of January.

Uploaded File Name:

File Link: [Open the file](#)

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Thompson, Jo

From: Jacquie Helt <Jacquie.Helt@seiu775.org>
Sent: Monday, September 07, 2015 9:37 PM
To: Thompson, Jo
Cc: Jacquie Helt
Subject: Medicaid Expansion Public Comment II
Attachments: Celeste Thompson.docx; Cherie Knowles.docx; Cris Love.docx; Crystal Huether.docx; Mike Coznd.docx

Jacquie Helt
Montana State Director
SEIU 775

Phone: 406-544-9682

#Fightfor15 #homecare15 #lowpayisnotok

Mike Coznd
1736 Montana Street
Missoula MT 59802

I have worked as a caregiver for fourteen years, the last time I had healthcare was when I was in the navy over twenty years ago. I do worry about my health, right now I have constant toothaches because I can't afford to see a dentist. I know my bad teeth are effecting my health. Also, I don't want to lose my teeth – I feel like I am stuck. Approving Medicaid will help me get the care I need

I work hard for my clients – we need to have healthcare, how is it that we can live in such a rich country and not get our fair share?

I will benefit, my clients will benefit, other workers will benefit, approving the Medicaid Waiver makes sense for Montana, it will result in more jobs and it will help our small town hospitals continue to give care. We are Montanan's and we think this is a good deal!

Crystal Huether
9 ½ 16th Street South
Great Falls, MT 59401

I have been a caregiver for seven years – I currently have no health insurance; my daughter is 2 years old and qualifies for CHIP

I require medication to treat my bi-polar condition; I can't always get my medicine because I simply don't have the money. I'm sure I don't need to explain what happens when I don't take my medicine on a regular basis or I don't have enough to take full doses. My daughter and I scrimp on so many things-I don't think I should have to scrimp on my medication.

So many people that work as caregivers are in the same boat as I am – so many Montanans – please pass the Medicaid Waiver

Cris Love
1351 Quartz Place
Billings, MT 59105

I have been a longterm caregiver for 16 years – I don't have healthcare and haven't had any for years. I was recently diagnosed with Diabetes – I believe if I could have gone to the doctor they would have caught my condition sooner, before full blown diabetes. I am upset and angry that this happened to me. I am really scared without Medicaid Expansion that I won't get the care I need. Then, if I get sick who will care for my clients

I am doing everything that I can to improve my health, but I need healthcare and so do 70,000 other Montanans – this is a good deal – please approve the Waiver

Cherie Knowles
7820 West Riverside Drive
Missoula, MT 59802

My name is Cherie and I have been a caregiver for the past nineteen years. The last access to health insurance was in 2012 – I have been without since then

I have been in remission from cancer, but I need three different cancer screenings annually. I can't afford to have all three each year so I pick one. Making this difficult choice isn't a plan – it feels like I am gambling with my health maybe even my life!

Approving the Waiver would allow me to get the care I need. I would also be able to save a little money for retirement or an emergency instead of every spare cent going toward medical emergencies and prescriptions.

I really need to see a dentist, I have lost so many teeth I really am afraid to smile because I am embarrassed – so much for confidence

Celeste Thompson
913 Pattee Creek Drive #E
Missoula MT 59801

My name is Celeste and I have been a Caregiver for twenty years. The last time I had health insurance was as a child on my father's health plan.

I have been working hard to pass Medicaid Expansion for the past three years, two weeks ago I had emergency surgery to address some cancerous issues. I am so worried about my health and how I am going to pay for my bills and my medical bills

I feel like worrying makes me sicker – it's a vicious cycle. I know I am a troubled sleeper, I actually wake myself up from my own snoring, I would like to see a doctor so I can get a good night's sleep.

I take good care of my clients – I work hard to keep them healthy – I make their meals, clean their homes, bath them, wash their hair – I do almost everything for them

Please pass the Medicaid Waiver, I know I need more medical procedures, ignoring them or putting them off will only make me sicker And, I know I am not the only one in this boat. I work hard, I don't know what else I can do to make this happen

Please hear our voices

180
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Thompson, Jo

From: beekeepertommy@gmail.com
Sent: Monday, September 07, 2015 9:22 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Thomas Startin
Email: beekeepertommy@gmail.com
Comments: I strongly support the HELP Act.
Uploaded File Name:
File Link: [Open the file](#)

179
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Thompson, Jo

From: zandy@blackfoot.net
Sent: Monday, September 07, 2015 9:21 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Alexandra Startin
Email: zandy@blackfoot.net
Comments: I strongly support the HELP Act.
Uploaded File Name:
File Link: [Open the file](#)

178
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Thompson, Jo

From: dmshaf@bresnan.net
Sent: Monday, September 07, 2015 9:19 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Doreen Shafizadeh
Email: dmshaf@bresnan.net
Comments: I strongly support the HELP Act.
Uploaded File Name:
File Link: [Open the file](#)

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Thompson, Jo

From: Jacquie Helt <Jacquie.Helt@seiu775.org>
Sent: Monday, September 07, 2015 8:58 PM
To: Thompson, Jo
Cc: Jacquie Helt
Subject: Medicaid Expansion Public Comment I
Attachments: Ashley Arnold.docx; Jana Gray.docx; Lori Swartz.docx; Roderick Four Star.docx; Tammy Boe.docx; Verna Not Afraid.docx; Winnifred Schafer.docx

Attached are public comments from some of our members

Jacquie Helt
Montana State Director
SEIU 775

Phone: 406-544-9682

#Fightfor15 #homecare15 #lowpayisnotok

Roderick Four Star
POB 552
Frazier, MT 59225

My name is Rick and I have been a caregiver for seven years – I make SURE my 94 year old mother is taken care of, I also care for my older brother who is handicapped. I am terrified if I get hurt or sick that they would be put in a rest home – I would also lose my job. I work hard to keep myself healthy, but the older I get – I do need to have checkups and some prescriptions.

We need Medicaid Expansion, people who are sick need to be treated, As caregivers we could be spreading infections like flu, colds etc – we get sick and then our clients get sick

We have waited so long, people are dying and getting sicker every day. We live in the richest country in the world – please don't make us wait any more.

Winnifred Schafer
6295 MT Highway 13
Wolf Point MT 59201

My name is Winnifred Schafer I am a member of the Sioux and Assiniboine Tribes. I have been a Caregiver for 35 years. I currently get my healthcare through Indian Health Services. The problem is, I don't always get the care I need, when I need it. What we can access on our reservation is limited. If I had Medicaid as an option I could travel to Billings to get necessary procedures.

We have waited so long to expand Medicaid – 19,000 Natives in Montana are in the gap – we already know life expectancy for American Indians is less than white Montanans. Medicaid will help us get healthier sooner and stay healthier so we can take care of our clients.

Please grant the Medicaid Waiver

Lori Swartz
POB 2914
Missoula, MT 59806

I have been a caregiver for 32 years. I have Healthcare for Healthcare Workers and I am so grateful for it, but we need more slots – we have lobbied the legislature for more, but there never seems to be enough funding

We have worked for the past 3 ½ years to pass Medicaid Expansion, against all odds, we passed it. Now, all we need is the Waiver from CMS so other Montanans can finally get the care they need. We work hard, we pay our taxes, please pass the Waiver

Verna Not Afraid
POB 725
Crow Agency MT 59022

My name is Verna and I have been a caregiver for twenty years. It is hard work, I have had surgery on my hip and recently I hurt my shoulder moving my client. I have HIS, but it just doesn't get me the care I need. I am in constant pain and don't have the money to get the medication I need for my hip

I would love to go to the dentist, I have toothaches and can't afford to go. I just don't understand, I work hard and is still feel like I fall through the cracks.

We need Medicaid Expansion now. Thank you

Jana Gray
384 Farm-to-Market Road #2
Libby, MT 59923

I have been a caregiver for 32 years I don't currently have any health coverage, the last time I had insurance was in 2005.

After so many years as a caregiver, I do have some health issues, a chronic pain in my back and legs. I need new glasses, but just can't afford them. I would be over the moon at the chance to go to the dentist. I treat toothaches with over the counter solution and Advil

I work hard caring for my client, I don't make a lot of money, too much for Medicaid and not enough to buy on the Exchange. I feel like I have slipped through the cracks for so long. I was so excited when the legislature passed Medicaid Expansion

Please don't take away my hope, my client needs me and I need healthcare

Please grant the Waiver

Tammy Boe
4425 Morgan Avenue
Billings, MT 59101

I have been a caregiver for 17 years; I currently have health insurance through Healthcare for Healthcare Workers. I feel so lucky to finally get on the plan, so many of my co-workers don't get it because there aren't enough slots

I know how much they worry and I know they go without care they need, I know because I did the same thing and it was really stressful

We need to be health in order to take care of our clients; I just don't understand – we are healthcare professions and so many of us don't have healthcare

Please approve the waiver

Ashley Arnold
429 7th Street North
Glasgow, MT 59230

For the past ten years I have worked as a long-term care provider in Montana. The last time I had health insurance prior to my eighteenth birthday when I was covered under my father's plan through his job.

I constantly live under the fear that I will get hurt or sick and I don't know what I would do. I do have a couple of procedures I should have done, but I don't have the money to pay for them.

Having access to health insurance under Medicaid Expansion would allow me to make sure I am okay for once. It would take a huge weight off my shoulders to not constantly worry about my health and my finances.

As a caregiver I do a wide range of duties to help my clients stay in their homes. Duties such as bathing, dressing, cooking, cleaning, laundry, shopping, all manner of hygiene details. I transfer clients from wheelchairs to bed, shower etc. My work is physically and emotionally demanding.

We need Medicaid Expansion NOW. Expanding Medicaid will save lives. Lives of people like me that are caregivers that care for others. We have waited too long.

140
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Thompson, Jo

From: bmead@montanapolicy.org
Sent: Monday, September 07, 2015 8:27 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form
Attachments: Brent Mead.pdf

Name: Brent Mead
Email: bmead@montanapolicy.org
Comments: File attached
Uploaded File Name: Brent Mead.pdf
File Link: [Open the file](#)

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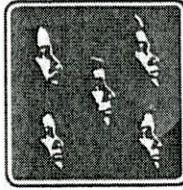
Thompson, Jo

From: kim <kim@mhrn.org>
Sent: Monday, September 07, 2015 3:58 PM
To: Thompson, Jo
Subject: Medicaid expansion waiver comment
Attachments: Public Comment MHRN.pdf

Hi, Jo.

Find attached the Montana Human Rights Network's comment on the posted waiver. Thanks!

Kim



montana
HUMAN RIGHTS NETWORK

Jo Thompson
Department of Public Health and Human Services
PO Box 202951,
Helena, MT 59620-2951

September, 7th

Dear Jo,

Thank you for the opportunity to comment on Montana's submission of an 1115 Waiver to expand Medicaid in Montana through SB 405 (the HELP Act). The Montana Human Rights Network (MHRN) is a state based 501c3 organization. We have 1,800 members and 7,000 supporters across the state and one of our central programmatic areas is economic human rights. Since 2005 our economic human rights program has featured community education and policy advocacy aimed toward improving access to healthcare and working for the realization of Montanan's human right to healthcare. In doing so we have supported single-payer legislation, worked to expand access to public healthcare programs, advocated to increase meaningful regulation of private insurance, and support public policies that generally promote good healthcare and health insurance options for Montanans. For the last 3 years, MHRN has worked to pass legislation that would expand Medicaid for those Montanans who have been left in the coverage gap.

As DPHHS is aware, the HELP Act was a policy compromise that gained the support of a diverse array of individual lawmakers, advocacy organizations, healthcare providers, and Montanans in the coverage gap. The waiver that DPHHS has drafted based on the legislation passed in April of 2015 is in line with federal Medicaid regulations and in line with waivers submitted by other states that have been approved by CMS. Advocates in Montana are particularly proud of the discreet ways that this waiver protects Montana enrollees in a more robust way than the policy approved in Indiana – effectively rolling back the edges that CMS set for state level policy compromise. For example in Indiana, enrollees under 100% of the poverty level are punished for nonpayment of premiums with a less generous benefits package and cost sharing requirements that could exceed the monthly premiums required under the more generous benefits package. This waiver is better policy: enrollees under 100% of the federal poverty line are not punished for nonpayment. MHRN believes that this is a significant improvement upon Indiana's waiver. We support the waiver that has been posted and appreciate the pace with which the Department has moved on this urgent matter.

MHRN is particularly pleased that under Montana's waiver the following people will be exempt from premiums and copays:

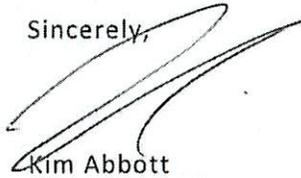
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- Montanans who are medically frail,
- individuals who live in a region where the third party administrator is unable to contract with sufficient providers,
- individuals who require continuity of care that is not available or could not be effectively delivered through the third party administrator, and
- those otherwise exempt under federal law, including American Indians.

These exemption may result in nearly one-half of all newly eligible population enrolled in traditional Medicaid.

Montanans are waiting for access to healthcare and some of these Montanans simply cannot wait much longer. While SB 405 is not the legislation that MHRN would have drafted, this waiver is the waiver that MHRN would have drafted based on the legislation that was passed. It will work and it will ensure that thousands of Montanans gain access to life saving healthcare.

Sincerely,

A handwritten signature in black ink, appearing to read "Kim Abbott", written over the word "Sincerely,".

Kim Abbott
Co-Director

168
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Thompson, Jo

From: Robin Turner <rturner@mcadsv.com>
Sent: Monday, September 07, 2015 3:37 PM
To: Thompson, Jo
Cc: Robin Turner
Subject: Medicaid Comment

To Whom It May Concern:

Please accept MCADSV's comments in support of Montana's HELP Act. The Montana Coalition Against Domestic and Sexual Violence is a statewide organization that represents the advocate programs in our state. These advocate programs provide direct services and support to victims of sexual assault, stalking, and domestic/dating violence. We are in support of the HELP Act, and publicly supported the act throughout the legislative process.

MCADSV represents programs committed to the health and safety throughout Montana. The clients of our member programs often fall within the current Medicaid coverage gap. Some of these clients are escaping dangerous situations with few to no health care coverage resources. They are often responsible for their children and other dependents. They deserve health care coverage in order to ensure that they can remain safe and healthy while they end an abusive relationship. Other clients have experienced violence or sexual assault and need medical care in order to heal from injuries they received in the commission of a crime. They deserve the ability to access health care without going bankrupt.

MCADSV also has a general interest in meeting the basic needs of Montana citizens. Montana's Medicaid expansion waiver will open up access to health care coverage for tens of thousands of Montanans who have been waiting for years for assistance.

The sooner this waiver is approved, the better. Please feel free to call me at (406) 443-7794 x 118, should you need more information.

Robin M. Turner
Public Policy and Legal Director
Supervising Attorney, SALS
Montana Coalition Against Domestic and Sexual Violence
(406) 443-7794 x 118
rturner@mcadsv.com
P.O. Box 818
Helena, MT 59624

Find us at www.mcadsv.com.

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Thompson, Jo

From: Terry Talcott <swindwalker@hotmail.com>
Sent: Sunday, September 06, 2015 7:08 PM
To: Thompson, Jo
Subject: HELP Act

My wife and I support the expansion of medical coverage and the enactment of this legislation.

Terry R. Talcott

Marcia A. Talcott

166
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Thompson, Jo

From: betsykhere@blackfoot.net
Sent: Saturday, September 05, 2015 3:57 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Betsy Manore

Email: betsykhere@blackfoot.net

Comments: Please accept the Medicaid HELP Act before November 1, 2015. Montana needs this ! Thank you
Betsy Manore

Uploaded File Name:

File Link: [Open the file](#)

165
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Thompson, Jo

From: Jerri Paulk <jlsp48@yahoo.com>
Sent: Friday, September 04, 2015 1:57 PM
To: Thompson, Jo
Subject: Health and Economic Livelihood Partnership program waiver

Dear Ms. Thompson

I am submitting this comment in support of the demonstration waiver which, if approved, will extend healthcare coverage to over 70,000 Montanans, including over 20,000 Native Americans.

Out of 33 states with significant American Indian populations, Montana ranks the highest of any state in uninsured American Indians (40 percent). American Indians residing in Montana suffer from significant disparities in life expectancy (nearly 20 years!). The causes of health disparities are complex, but inadequate access to healthcare is one important and correctable contributor.

Let's move forward and make Montana a healthier place for all. All Montanans, regardless of income, should be able to enjoy a healthier and longer life.

Sincerely,

Jerri Paulk
359 Colorado Ave Unit 204
Grand Junction, CO 81501

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Thompson, Jo

From: Bob Marsalli <bmarsalli@mtpca.org>
Sent: Friday, September 04, 2015 4:24 PM
To: Thompson, Jo
Subject: MPCA Letter of Support
Attachments: MPCA Letter of Support DPHHS 1115 Waiver Application.pdf

Importance: High

Good afternoon, Jo!

Here is MPCA's letter of support for the 1115 Research and Demonstration Waiver Application.

Bob Marsalli
Montana PCA





Friday, September 4, 2015

Jo Thompson, Bureau Chief
Montana Department of Public Health and Human Services
Health Resources Division
1400 N. Broadway, Room A206
Helena, MT 59620

Dear Ms. Thompson –

Please accept this letter of support from the Montana Primary Care Association for the Montana DPHHS Section 1115 Research and Demonstration Waiver Application.

Montana's Medicaid expansion waiver will provide increased access to necessary and important healthcare services for tens of thousands of now underserved and vulnerable Montanans across the state. The waiver is a result of a truly bipartisan legislative compromise forged over countless months by a diverse coalition of advocates, policy makers, and elected officials; led and supported by the office of the Honorable Governor Steve Bullock. This policy will work in practice and improve the lives and health of those who are currently locked out of coverage otherwise available through Montana's federally-facilitated health insurance marketplace.

Many of these currently uninsured Montanans are served today by Montana's 17 federally qualified community health centers regardless of their ability to pay. An approved waiver will mean that these health centers will soon be able to enroll those eligible for the expanded Medicaid coverage into a comprehensive health plan that will provide them with easier and better coordinated access, when necessary, to inpatient and specialist healthcare for their more chronic and complex health conditions. Furthermore, the waiver protects the essential cost-based reimbursement method – or Prospective Payment System – that enables community health centers to provide a wide array of enabling and ancillary services that address the social conditions that influence health status, as well as the primary and preventive

We ask that CMS move swiftly in approving this waiver. Thousands of Montanans have waited far too long.

Sincerely,

Bob Marsalli, Executive Director
Montana Primary Care Association

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Thompson, Jo

From: Tyanna Bostwick <Tyannajlee@gmail.com>
Sent: Friday, September 04, 2015 2:30 PM
To: Thompson, Jo
Subject: Health and Economic Livelihood Partnership program waiver

Dear Ms. Thompson

I am submitting this comment in support of the demonstration waiver which, if approved, will extend healthcare coverage to over 70,000 Montanans, including over 20,000 Native Americans.

Out of 33 states with significant American Indian populations, Montana ranks the highest of any state in uninsured American Indians (40 percent). American Indians residing in Montana suffer from significant disparities in life expectancy (nearly 20 years!). The causes of health disparities are complex, but inadequate access to healthcare is one important and correctable contributor.

Let's move forward and make Montana a healthier place for all. All Montanans, regardless of income, should be able to enjoy a healthier and longer life.

Sincerely,

Tyanna Bostwick
215 Toledo street
Billings, MT 59101

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Thompson, Jo

From: Erin McGowan Fincham <emcgowanfincham@mt.net>
Sent: Friday, September 04, 2015 2:27 PM
To: Thompson, Jo
Cc: Kelley Matt
Subject: AMPHO comments--Medicaid Expansion waiver
Attachments: AMPHO Med Exp Waiver letter..doc

Hi Jo:

Please accept the attached comments on behalf of the Association of Montana Public Health Officials.

Thank you!

Erin

Erin McGowan
AMPHO Executive Director
Smith and McGowan, Inc.
34 W. 6th Ave, Suite 2E
Helena, MT 59601
(406) 443-1570--office
(406) 443-1592--fax
(406) 439-8822--cell
emcgowanfincham@mt.net

AMPHO

Association of Montana Public Health Officials



Public Health
Prevent. Promote. Protect.

September 4, 2015

Richard Opper, Director
Montana Department of Public Health and Human Services
PO Box 4210
Helena, MT 59604-4210

September 4, 2015

Re: Comments, Montana Health and Economic Livelihood Partnership (HELP) Program Section
1115 Research and Demonstration Waiver Application

Dear Director Opper:

Thank you for the opportunity to comment on the draft application for the Health and Economic Livelihood Partnership (HELP) Act. On behalf of the Association of Montana Public Health Officials (AMPHO), I'd like to reiterate our support in general, and especially encourage swift enactment of this policy. AMPHO is an association of Lead Local Public Health Officials/Departments across these state—many of our members have commented on the waiver individually. Local health departments are truly on the frontlines of working with our uninsured citizens every day, and as such they see the urgency of making coverage available to these 70,000 Montanans in short order. We hope that the process to approve the draft 1115 waiver through CMS is swift so that we can get to work.

The enacting bipartisan legislation, S.B. 405, was supported by an impressive cross-section of stakeholders last session, from business organizations to healthcare providers and health advocates to financial entities and many others. Most importantly, scores of uninsured residents who would gain access to healthcare through the proposal drove to Helena to tell their stories about how being uninsured has impacted them. It is abundantly clear based on these individual stories and by the overwhelming level of support in general that Montana is ready for enactment of this expansion of coverage, and that time is of the essence.

Please consider AMPHO as a resource to connect DPHHS to local health departments across the state when you are ready to begin the enrollment process.

Sincerely,

Erin McGowan Fincham, Executive Director
Association of Montana Public Health Officials

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Thompson, Jo

From: Hall, Tiffany <Tiffany.Hall@providence.org>
Sent: Friday, September 04, 2015 2:26 PM
To: Thompson, Jo
Subject: Providence Health Services comment on Medicaid Expansion Waiver
Attachments: 9.4.15 PHS Medicaid waiver comment.pdf

Hello,

Attached please find a letter from Providence Health & Services re: the application for Medicaid Expansion waivers.

Please contact me with any further questions.

Thank you,
Tiffany

Tiffany Hall
State Advocacy Program Manager, AK & MT
Providence Health & Services
3760 Piper St. | Anchorage, AK 99508
Office: 907.212.2013 | Cell: 512.968.1933
Tiffany.Hall@providence.org

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Administration
500 West Broadway
Missoula, MT 59802
p: 406.329.5630
f: 406.329.5693
www.saintpatrick.org



September 3, 2015

Richard Opper
Department of Public Health and Human Services
P.O. Box 202951
Helena, MT 59620-2951

RE: The Health and Economic Livelihood Partnership (HELP) Medicaid Waiver

Dear Mr. Opper:

On behalf of Providence Health & Services Western Montana, please accept my formal comments on the Montana application for federal waivers necessary to implement the HELP Act.

Providence Health & Services Western Montana is a not-for-profit Catholic health care ministry committed to providing for the needs of the communities it serves. We serve the health needs of people across Western Montana through our two ministries –St. Patrick Hospital in Missoula and Providence St. Joseph Medical Center in Polson.

We appreciate the Department's solicitation of public comment, and we support the request for the Section 1115 Demonstration Waiver necessary to provide health coverage to certain adults, and the Section 1915(b)(4) waiver necessary to utilize a third party administrator to manage the demonstration program.

Access to health care is a basic human right, and our long-standing Mission of providing compassionate service to the poor and vulnerable aligns directly with the goals of the HELP Act by expanding that access to care to more Montanans. We were a strong advocate of Senate Bill 405, and we understood the challenges of expanding the traditional Medicaid program.

As such, Providence Western Montana supports the proposal to provide continuous coverage to the expanded eligible population, including childless adults with incomes below 138% of the federal poverty level and adults with children with incomes between 51% and 138% of the federal poverty level. This will help to fill gaps in coverage and ease the way for this population.

Additionally, we approve of the cost sharing and disenrollment plans. Various cost sharing plans are in place already in the current Medicaid system, and these strategies follow suit; they are fair, there are exceptions for those particularly in need, and they provide beneficiaries with a share in responsibility.

Regarding the third party administration (TPA), we support continuing the already successful utilization of TPA services for the Healthy Montana KIDS program and agree the waiver request should be approved to continue using a TPA to provide certain management services for the expansion population.

Providence Western Montana supports the waiver requests as they are written. Thank you for helping to make this possible in Montana. If you have questions or need additional information please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff D. Fee". The signature is stylized and somewhat cursive.

Jeff D. Fee
Chief Executive
Providence Health & Services
Western Montana Region

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JKD
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Thompson, Jo

From: braines@pptaglobal.org
Sent: Friday, September 04, 2015 1:12 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form
Attachments: Brenna Raines.pdf

Name: Brenna Raines

Email: braines@pptaglobal.org

Comments: Please find attached comments from the Plasma Protein Therapeutics Association. Thank you!

Uploaded File Name: Brenna Raines.pdf

File Link: [Open the file](#)



September 7, 2015
Reference No.: SASC15027

VIA ELECTRONIC DELIVERY

The Department of Public Health and Human Services
Attn: Jo Thompson, Health Resources Division
PO Box 202951
Helena, MT 59620-2951
406-444-4146
iothompson@mt.gov

Re: Montana Health and Economic Livelihood Partnership (HELP) Program Waiver

Dear Ms. Thompson,

The Plasma Protein Therapeutics Association (PPTA) appreciates the opportunity to comment on the Montana Health and Economic Livelihood Partnership (HELP) Program Waiver. PPTA applauds this reform effort and its goal to expand access to health coverage for over 70,000 new adults in Montana. This newly covered population may contain individuals who use a plasma protein therapy. PPTA would like to share its health reform principles to help Montana best care for this unique population.

PPTA is the standard setting and global advocacy organization that represents plasma donation centers and manufacturers of plasma-derived therapies and their recombinant analogs (collectively known as "plasma protein therapies"). Our North American members include: Baxalta, Biotest, CSL Behring, Grifols, and Kedrion Biopharma. PPTA members provide more than 75% of the plasma protein therapies used in the United States.

Plasma protein therapies are used to treat rare, life-threatening diseases, including hemophilia and other bleeding disorders, primary immune deficiencies, and Alpha-1 antitrypsin deficiency. A rare disease or disorder is one that affects fewer than 200,000 people in the United States. It is estimated that 28,000 individuals have hemophilia, 16,000 have a primary immune deficiency, and 6,500 have alpha-1 antitrypsin deficiency; PPTA estimates that approximately 105 Montanans have hemophilia, 90 Montanans have a primary immune deficiency, and 20 Montanans have alpha-1 antitrypsin deficiency.

Patients need affordable health care insurance.

PPTA believes patients deserve access to appropriate public and private health insurance coverage regardless of health or disability, employment status, age, or medical predisposition. Specifically, PPTA urges state governments to adopt legislation and/or regulations that protect patients from health insurance industry practices that impose punitive cost-sharing requirements upon patients with rare, chronic diseases

and disorders. PPTA supports Montana's plan to limit premiums and copayments for all new beneficiaries.

Patients need unfettered access to drugs and biologics.

PPTA supports patient access to all medically appropriate, life-saving plasma protein therapies. Each plasma protein therapy is a unique biologic to which patients respond differently. Each therapy is approved by the FDA for distinct clinical indications, and each has distinct contraindications. Treating these therapies as interchangeable directly contradicts expert clinical recommendations as well as the determinations made under FDA guidelines, which have undergone years of review.

There are two groups of expert providers and researchers who develop best practice guidelines for plasma protein therapies. The American Academy of Allergy, Asthma & Immunology (AAAAI) makes recommendations for the use of Immune Globulin therapy in treating primary immune deficiencies, and the National Hemophilia Foundation's Medical and Scientific Advisory Council (MASAC) makes recommendations for the use of clotting factor therapies in treating bleeding disorders such as hemophilia. Both groups have issued recommendations on the non-interchangeability of plasma protein therapies:

The eighth principle of AAAAI's Eight Guiding Principles for Effective Use of Intravenous Immune Globulin (IVIG) for Patients with Primary Immunodeficiency states "IVIG is not a generic drug and IVIG products are not interchangeable. A specific IVIG product needs to be matched to patient characteristics to ensure patient safety. A change of IVIG product should occur only with the active participation of the prescribing physician." This principle holds true for subcutaneous immune globulin (SCIg) therapies as well.

MASAC Recommendation #159 states, "Clotting factor therapies are neither pharmacologically nor therapeutically equivalent and vary based upon purity, half-life, recovery, method of manufacture, viral removal and inactivation processes, potential immunogenicity, and other attributes. The characteristics of each product and the resultant product choice for an individual patient require a complex decision making process with the ultimate product being agreed upon by the patient and their respective healthcare provider. It is critical that the bleeding disorders community has access to a diverse range of therapies and that prescriptions for specific clotting factor concentrates are respected and reimbursed."

PPTA shares Department's stated goal of ensuring, "All Montanans have access to quality health-care." Unfortunately, some health care payers in the United States use cost-containment strategies that limit patient access to quality health-care. An example of this is step-therapy. Under a step therapy protocol, insurers will require a diagnosed and properly treated beneficiary to switch from a medically appropriate therapy to one that is preferred on the company's formulary. It may be a therapy the beneficiary has never tried before, or a therapy that the beneficiary tried in the past with poor results. This protocol violates continuity of care by forcing a beneficiary to change from the medically appropriate therapy that was determined in consultation between the patient and the prescriber. It is also not cost-effective nor quality care because in failing on a

preferred therapy a beneficiary may have adverse events that are painful for the beneficiary, and costly to the payer. This was recognized by CMS in a prior proposed rule that said step therapy poses a risk for poor health outcomes, which would result in increased costs to the Medicaid program.¹ PPTA suggests that Montana not allow its Third Party Administrator to implement a step-therapy protocol for these therapies.

Patients need access to quality providers.

PPTA believes state Medicaid programs should consider the needs of individuals with rare, chronic conditions when implementing health reform. Not every provider has the training and experience necessary to provide these patients with quality care. Nearly all of the diseases and disorders treated with a plasma protein therapy require a physician with a sub-specialty in the specific disease. For this reason, PPTA suggests Montana Medicaid establish standards that allow Medicaid recipients access to hemophilia treatment centers and specialty pharmacies that comply with MASAC Recommendation 188.

PPTA appreciates your consideration of our principles and welcomes the opportunity to discuss them further. Should you have any questions or require additional information please do not hesitate to contact Brenna Raines (braines@pptaglobal.org or 443-458-4667) at the association.

Sincerely,



Brenna Raines
Senior Manager, Health Policy
Plasma Protein Therapeutics Association

¹ See Medicaid Program; Payment for Covered Outpatient Drugs Under Drug Rebate Agreements with Manufacturers, 60 Fed. Reg. 48442, 48454 (Sept. 19, 1995). CMS has not finalized the proposed rule.

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Thompson, Jo

From: bjmross@gmail.com
Sent: Friday, September 04, 2015 11:37 AM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: barbara jane ross

Email: bjmross@gmail.com

Comments: 70,000 Montanans need this coverage. They have fallen through the cracks. This tremendous benefit is offered and paid for by the federal government. The cost to Montana tax payers in 2 years is small compared to the health care that will be provided to those in need. Other states have accepted MEDICAID expansion. The dollars are there, but other states will get them if we do not accept. Please approve of the Montana Legislature's waiver request. Many Montanans have worked hard to arrive at this agreement.

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Thompson, Jo

From: bigflat.olson61@gmail.com
Sent: Thursday, September 03, 2015 5:15 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Judith E Olson, MD

Email: bigflat.olson61@gmail.com

Comments: I strongly support Medicaid expansion for Montana. To leave out some of our most vulnerable citizens is unconcheable. These working families deserve help to obtain health care in a timely fashion rather than an emergent manner. The Centers for Medicare and Medicaid should consider and approve a waiver in a timely fashion.

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Thompson, Jo

From: Marci McLean <marci@westernnativevoice.org>
Sent: Thursday, September 03, 2015 4:42 PM
To: Thompson, Jo
Subject: Health and Economic Livelihood Partnership program waiver

Dear Ms. Thompson

I am submitting this comment in support of the demonstration waiver which, if approved, will extend healthcare coverage to over 70,000 Montanans, including over 20,000 Native Americans.

Out of 33 states with significant American Indian populations, Montana ranks the highest of any state in uninsured American Indians (40 percent). American Indians residing in Montana suffer from significant disparities in life expectancy (nearly 20 years!). The causes of health disparities are complex, but inadequate access to healthcare is one important and correctable contributor.

Let's move forward and make Montana a healthier place for all. All Montanans, regardless of income, should be able to enjoy a healthier and longer life.

Sincerely,

Marci McLean
4 Wakefield Dr
Billings, MT 59102

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Thompson, Jo

From: Jerry Kuester <thekuesters2316@gmail.com>
Sent: Thursday, September 03, 2015 2:14 PM
To: Thompson, Jo
Subject: Medicaid Expansion

I want to respond to the skeptics who believe medicaid recipients are lazy and take advantage of the system. Working gives people with disabilities a chance to feel like they are contributing to society which builds self-esteem. They enjoy using the limited skills they possess. It gives them an opportunity to socialize with others. Many identify with pride the job they do and gives them a sense of accomplishment and gives their life meaning.

For example, my son suffers from epilepsy. After graduating from high school he finished truck driving school. Seizures prevented him from driving a vehicle so he walked to work or rode a bike. Even after sustaining severe injuries which included a broken jaw and brain damage he continued to work when he he could. He did not qualify for medicaid and with his limited income he was unable to cover all of his basic living expenses including his mounting medical bills. Evan now that he is in a wheelchair after experiencing a spinal cord injury he has strong religious convictions and wants to help others. Finally he is receiving medicaid.

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Thompson, Jo

From: csjuneau@3rivers.net
Sent: Thursday, September 03, 2015 11:30 AM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Carol Juneau
Email: csjuneau@3rivers.net

Comments: I support the HELP Act to increase health coverage for many Montanans which will include 20,000 of Montana's first peoples. My family has had serious life threatening health issues this year and we are very fortunate to have Medicare and supplemental health insurance that provided us with quality health care. All Montanans, regardless of income, should be able to have access to health care whether it is for preventive care or to treat life threatening illnesses. The HELP Act will insure that many of our neighbors and relatives who are without health insurance now will have access to health insurance. I listened to the hearings on the HELP act and all the brave people who stepped forward sharing their stories of health care needs. Their issues were compelling and for some it was life and death. Let's move forward and get the HELP act approved as soon as possible.

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Thompson, Jo

From: cajacobsen@q.com
Sent: Thursday, September 03, 2015 10:36 AM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Carol Ann Jacobsen

Email: cajacobsen@q.com

Comments: I think it is extremely important that Montanans who do not have affordable healthcare be able to access coverage through Medicaid expansion. I urge CMS to approve the waiver that Montana is proposing. The health and lives of thousands of Montanans are at stake.

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