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Thompson, Jo

From: Margaret Wallace <margaret@mmaoffice.org>
Sent: Thursday, September 03, 2015 9:05 AM
To: Thompson, Jo
Subject: MMA letter of support for waiver
Attachments: MMA letter of support waiver FINAL.pdf

Hi Jo,

Thank you for returning my call. Please find attached MMA's letter of support for the waiver. Please let me know if you have questions or concerns. Thank you.

Margaret Wallace, Association Management Services Director
Montana Medical Association
2021 Eleventh Ave., Suite 1
Helena, MT 59601
P: 406-443-4000
F: 406-443-4042
Margaret@mmaoffice.org

2021 Eleventh Avenue
Suite 1
Helena, Montana
59601-4890



1.406.443.4000
FAX 1.406.443.4042
www.mmaoffice.org
mma@mmaoffice.org

September 3, 2015

Montana Department of Public Health and Human Services
111 N Sanders St #301
Helena, MT 59601

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

To Whom It May Concern:

The Montana Medical Association (MMA) expresses its strong support for Montana's Section 1115 Demonstration Waiver as proposed to be submitted to the federal Center for Medicaid and Medicare Services (CMS) to expand Medicaid services in our state. The plan envisioned under this waiver will effectively reduce the number of uninsured individuals in Montana, improve patient access to health care, and ultimately improve the lives of thousands of Montanans.

This waiver, crafted as part of the Montana H.E.L.P. (Health and Economic Livelihood Partnership) Act to expand Medicaid coverage in our state, fulfills the purpose of a Section 1115 Waiver as a research and demonstration project. Each state has its unique attributes and a waiver provides the opportunity for states to implement expansion in a way that best fits an individual state. This waiver reflects what can work in our frontier state and is illustrative of the compromises struck and the commitment of our lawmakers and state leaders to improve the lives of Montana citizens. It includes workable options with provisions that will provide health care coverage, increase patient engagement in their health care decisions, and encourage the effective delivery of needed medical care. We are confident that measures can be put in place to evaluate how well these objectives are achieved, including patient outcomes.

As physicians, we see firsthand the health care implications when patients delay seeking medical care due to their lack of having health care insurance coverage. Under the expansion program, individuals will have a new health care coverage option that will allow them to obtain the right care at the right time. They will be more likely to have a primary care doctor and get preventive care. This could reduce the high economic burden of catastrophic illnesses that have gone untreated, decrease the use of the emergency room, and decrease medical debt. Another recognized benefit is the reduction in the amount of uncompensated care.

The waiver is an affordable and sustainable solution for the state of Montana as it encourages patient engagement and accountability. We recognize that the cost of health care to the patient can be very expensive, and that low-income patients should not go without care due to their inability to pay; however, the MMA supports the concept of increased patient accountability and cost-sharing by way of paying a small amount through premiums and copays. Research has shown that when patients are more accountable for their health care this leads to an increased value placed on their own health, and when patients value their own health it results in a positive net impact to the overall health care system. The waiver strikes a necessary balance between improved health care coverage and increased patient accountability.

We urge CMS to quickly approve this waiver in recognition of the high impact opportunity to expand coverage for low income Montanans. The expansion of health insurance coverage, as outlined in the waiver and H.E.L.P. Act, is an investment that has a healthy payback for all Montanans.

Sincerely,

A handwritten signature in black ink, appearing to read "Carter Beck".

Carter Beck, M.D.
MMA President

152
JK ✓

Thompson, Jo

From: Brewer, Katie <kbrewer@cascadecountymt.gov>
Sent: Thursday, September 03, 2015 8:35 AM
To: Thompson, Jo
Subject: Ltr re support for Medicaid Expansion
Attachments: 2015.09.02_Ltr re Medicaid Expansion Support.pdf

Good Morning,

Attached please find the September 2nd, 2015, letter signed by Board of Health Chair person, Sue Warren, on behalf of the Cascade County Board of Health.

Thank you,

Katie Brewer

Administrative Assistant to Health Officer
Cascade City-County Health Department
115 4th St South
Great Falls, MT 59401
Direct Line: 406-791-9291
Fax: 406-454-6959
Email: kbrewer@cascadecountymt.gov
Visit our website: www.cchdmt.org

"Healthy People in a Healthy Community"



CITY-COUNTY HEALTH DEPARTMENT

115 4th Street South • Great Falls, Montana • 59401 • Phone (406) 454-6950 • Fax (406) 454-6959

September 2, 2015

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

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. Enacting Medicaid Expansion is one of the top priorities of the Cascade City-County Board of Health because access to healthcare is a critically important component of the overall health of our population, both here in Cascade County and statewide.

Positive ramifications of coverage for Cascade County, and across the State include:

- Enhanced health status for county residents, and the positive impact that this will provide for their families.
- Hundreds of new jobs in health care - possibly as many as one thousand new positions across the state.
- New healthcare spending in our county's economy.

A product of bipartisan legislation, SB 405, was supported by an impressive cross-section of stakeholders from business organizations to healthcare providers, health advocates to financial entities, and many others. Most importantly, scores of uninsured Montanans who would gain access to healthcare through the proposal traveled 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 support of organizations across the state that Montanans are ready to expand Medicaid coverage, and that time is of the essence. Public health departments are one of the hubs that are ready to assist in the enrollment process. We hope that the process to approve the draft 1115 waiver through CMS is swift so that we can get to work.

- According to the US Census Bureau's 2009-2013 American Community Survey 5-year profile, 14.4% of Cascade County's population is uninsured.
 - 4661 Uninsured adults are eligible for Medicaid Expansion. (Montanabudget.org January 2015)
 - Estimates are that 15% of Cascade County residents under 65 do not have health insurance. (CCHD 2011-2014 Community Health Improvement Plan)
- Cascade County's leading causes of death are cancers, heart disease and chronic lower respiratory disease. (2011-2014 Community Health Improvement Plan)
- 2013 CHN (Community Health Needs) Survey indicated that the most common reason for a delay in getting health services was "It cost too much."

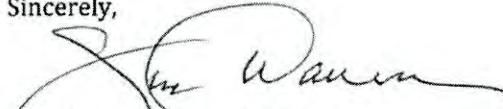
In applying for the federal waiver, and subsequently, in implementing the program expansion, we respectfully request that the Department of Public Health & Human Services adhere to these principles:

- Act as expeditiously as reasonably possible.
- Conduct the program in a way that enhances the dignity of the newly-covered, rather than detracting from it.
- Collaborate with local health departments to help us actively reach out to potential new enrollees so that the enrollment process is expeditious and effortless.

Once again, we wish to extend our support to the Department as it moves forward with expansion implementation. Cascade County looks forward to working with the Department to enroll residents in our county as soon as possible.

Thank you again for the opportunity to comment. Please contact Cascade County Health Officer, Tanya Houston at (406) 791-9269, with any questions or ideas about our participation in rolling out the HELP Program.

Sincerely,

A handwritten signature in black ink, appearing to read "Sue Warren". The signature is fluid and cursive, with a large initial "S" and "W".

Sue Warren, RN, MSN, NE-BC
Cascade City-County Board of Health Chair

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Thompson, Jo

From: Logan, Russell <rlogan@cfvh.org>
Sent: Thursday, September 03, 2015 7:45 AM
To: Thompson, Jo
Subject: RE: Help Waiver Request
Attachments: scan.pdf

Sirs,

Please find the attached comment from Clark Fork Valley Hospital composed by Dr. Gregory Hanson, MD, President & CEO and Jerry Pauli, Chairperson.

If need any additional information, please do not hesitate to reach out to me.

Respectfully,

Russell E Logan
Executive Assistant / Customer Service Representative
Clark Fork Valley Hospital
406-826-4813
rlogan@cfvh.org

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Clark Fork Valley Hospital & Family Medicine Network

10 KRUGER ROAD · PO BOX 768 · PLAINS, MT 59859 (408) 826-4800 · WWW.CFVH.ORG

September 1, 2015

Richard Opper
Director
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

Clark Fork Valley Hospital (CFVH) appreciates the opportunity to provide comments in support of the state of Montana's application for federal waivers necessary to implement the HELP act. CFVH is a 16-bed Critical Access Hospital located in Plains, MT. We are the sole provider of acute hospital care to the residents of Sanders County, with a population of approximately 11,000. We also operate a 28-bed long term care facility, three rural health clinics, home health and hospice services throughout our county.

On behalf of the Administration and Governing Board of CFVH, we would like to express support for the Department's 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.

Sanders County has one of the highest unemployment rates in the state of Montana and one of the highest rates of uninsured. We are also one of the poorest counties in Montana. It is estimated that our county has as many as 1000 residents who would qualify for coverage under the HELP Act (nearly 10% of our population). These are individuals who fall below the poverty level and do not qualify for assistance in the exchange under the Affordable Care Act. Although our hospital offers various forms of financial assistance to our patient population, it is a fact that individuals without health coverage do not seek preventative care, they tend to delay care when it is needed, and they often receive care in the most expensive and inappropriate setting – the emergency room.

We support the HELP Act as a Montana solution to the challenge of expanding Medicaid coverage in our state. We believe that the limited cost-sharing provisions in the program, as well as the involvement of the private sector in managing the program are key components that allowed this legislation to pass with bipartisan support in the recent legislative session. Having carefully followed the hearings and the debate, we believe that the people of Montana want to see this expansion of health coverage, but with the addition of some personal financial responsibility and the avoidance of growing state government.

We support the waiver requests as presented and we are prepared to offer similar support of these requests directly to CMS if asked.

Sincerely,

Gregory S. Hanson, MD
President/CEO

Jerry Pauli
Chairman, Governing Board

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Thompson, Jo

From: mgravatt@communitymed.org
Sent: Wednesday, September 02, 2015 3:26 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Mary Gravatt
Email: mgravatt@communitymed.org

Comments: My comments come, to some extent, as a result of working in the field of social services for the past 15 years, first as a child protection social worker and now as a case manager with the Medicaid waiver program. You would think being a social worker and a democrat, I might be 100 % in favor of the expansion, and yet I have reservations. First of all, I'm glad our 2015 Legislature approved Medicaid expansion, but I'm glad it was well thought out, and not a knee jerk reaction to the availability of federal funds we couldn't refuse. There will be great costs to Medicaid expansion that the state will have to bear, but it will create jobs, and give people, especially marginalized persons, and the "working poor," access to necessary medical care, including preventative. This is very positive. However, my main reservation is this, and I have seen it time and again as I've worked with families in the field of social services,... it is the beginning of a slippery slope when human beings get something for nothing. I hope the Montana system of Medicaid expansion has responsibilities built in, including co pays, possibly volunteer/work and drug testing requirements, deadlines, etc. I suspect other states have already broached these subjects and provide a template for building such responsibilities into our expansion program. I'm not advocating for a system too difficult for the average person to negotiate, but a system that gives Medicaid enrollees the chance to experience dignity, hope and respect for self and others. And by virtue of improved physical and mental health, to transition into improved quality of life for themselves, and their families. As much as possible I would hope Medicaid expansion would be one pillar by which our society tries to break the cycle of poverty and hopelessness.

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Thompson, Jo

From: Sarah Howell <sarah@montanawomenvote.org>
Sent: Wednesday, September 02, 2015 12:59 PM
To: Thompson, Jo
Subject: MWV Comments on HELP Act Waiver
Attachments: MWV Comments on HELP Act 1115 Waiver.pdf

Ms. Thompson,

Please find attached our comments on the proposed HELP Act 1115 waiver.
We appreciate the opportunity to submit comments.

Best,
Sarah

--

Sarah Howell
Executive Director, Montana Women Vote
406-317-1505
sarah@montanawomenvote.org



Montana Women Vote

725 W. Alder St, Suite 21
Missoula, MT 59802
(406) 317-1505
www.montanawomenvote.org

September 2, 2015

Mary E. Dalton, Montana Medicaid Director
c/o Jo Thompson
The Department of Public Health and Human Services
P.O. Box 202951
Helena, Montana 59620-2951

RE: Comments on Montana Department of Public Health and Human Services (DPHHS) Montana Health and Economic Livelihood Partnership (HELP) Program 1115 and 1915(b)(4) Waiver Requests to Federal Centers for Medicare & Medicaid Services

Dear Director Dalton:

Montana Women Vote stands in support of the proposed 1115 waiver to extend health care coverage to low-income Montanans pursuant to the passage of SB 405, the Health and Economic Livelihood Partnership (HELP) Act. This waiver represents the urgent and necessary action needed to provide low-income Montanans access to quality, affordable health coverage.

Montana Women Vote is a statewide organization of low-income women and families. We work to engage low-income women as informed voters, policy advocates, and community leaders, and to pass policies that will better the lives of women and families living in poverty. Access to health care has long been a crucial consideration in our work, as both research and experience show that lack of access to quality, affordable health care can negatively impact earnings and economic status, family health and wellbeing, mental health and substance abuse, and more.

Montana Women Vote, along with many allies and partner organizations, has worked to advance Medicaid expansion over the last three years. We supported the HELP Act during the 2015 legislative session, and feel that the passage of the HELP Act is both a victory for low-income people and represents a difficult and much-needed compromise to get the health care coverage that thousands of Montanans desperately need.

Over the last three years, we have worked with many Montanans who are uninsured and in the "coverage gap," eligible for Medicaid coverage under the proposed expansion. These people include Hannah, a 28-year-old member of the Confederated Salish and Kootenai Tribes who suffers from Lyme Disease and can't get the treatment

she needs; Lisa, a self-employed artist and substitute teacher in her 50s who – despite working two and sometimes three part-time jobs – can't afford private insurance and doesn't make enough to qualify for subsidies on the exchange; Nancy, who lost her job during treatment for breast cancer and now can't afford the follow-care she needs to ensure she stays cancer-free. These are but a few of the many, many stories we heard of Montanans who urgently need the HELP Act to be implemented. We have worked over the last six weeks to disseminate information about the waiver to these individuals and have heard overwhelming support for the waiver and proposed program.

Like many of our allies and coalition partners, Montana Women Vote has concerns about the proposed premiums and co-pays, and the potential for diminished enrollment and access to care. However, we recognize that CMS has previously approved similar premiums and cost-sharing measures in Indiana, and that approval set the stage for the difficult and intense negotiations that led to the HELP Act's passage. Furthermore, we feel that faced with a choice between a program that includes premiums and co-pays or no coverage for low-income Montanans at all, the choice is clear: we must implement the HELP Act to provide a pathway to coverage for some of our most vulnerable neighbors and community members.

We would like to express strong support for the state's proposed Fast Track Express Lane Eligibility as well as for 12-month continuous eligibility. We feel these components of the waiver are a common-sense approach to reducing "churn" as well as the burden of over-reporting placed on low-income Montanans.

In conclusion, we thank the state, DPHHS, and CMS for the opportunity to submit comments and for their attention to the needs of low-income Montanans. We reiterate our strong support for the proposed 1115 waiver and urge CMS to take immediate action without delay in order to provide health coverage that tens of thousands of Montanans desperately need.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sarah Howell".

Sarah Howell
Executive Director
Montana Women Vote

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Thompson, Jo

From: davada1@centurylink.net
Sent: Tuesday, September 01, 2015 8:50 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Virginia Davis

Email: davada1@centurylink.net

Comments: I urge those who are responsible to do whatever is necessary to pass the Medicaid Expansion bill. There are many people in Montana who are not able to have the medical help needed to keep them healthy. Please make it possible for them to be helped. Thank you.

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Thompson, Jo

From: ericaskinger2014@gmail.com
Sent: Tuesday, September 01, 2015 3:31 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Erica Skinger

Email: ericaskinger2014@gmail.com

Comments: While I am for more Montanans being enabled to go to a MD's office or a trained mental health counselor office, I am against a large percent of the 70,000 being added to the contract case load of unasked for uninformed about on-line counseling, support, monitoring, assessment, career guidance, or etc. The 70,000 new people to get health insurance coverage through Medicaid in Montana if at or below 138% of federal poverty line are to be accompanied by another 14,000 Montanans receiving new jobs. Whether for health (mental health most) or job hunting, I hope a good percent of the new - jobs will be in-person, sit down and talk to jobs. Any hope of \$\$ for mental health centers? I know DPHHS asked for comments in support of Medicaid expansion and the waiver of it being free, etc. I think we would rather comment in support of Medicaid expansion if there was less likelihood of it causing problems. Please add good changes. I have been in Montana for 20 years, all of which may have included on-line monitoring of me. I did not come with mental health problems. That was 21 years before.

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Thompson, Jo

From: Mary <marziehackett@hotmail.com>
Sent: Tuesday, September 01, 2015 8:35 AM
To: Thompson, Jo
Subject: Medicaid expansion

I have been a nurse since 1965, both in hospital nursing and public health, and have seen numerous times when Medicaid expansion was or could have been beneficial to patients and clients. The inception of Medicaid to pregnant woman made a big difference in pregnancy outcomes, as people were able to access care earlier. However, the in and out nature of coverage afterward causes much stress to families having to deal with health problems. We have a son who was disabled by cancer who has been able to access Medicaid through Social Security disability. He has gotten treatment that he could not have afforded otherwise, and he was a hard working man all his life. The co-pays with Medicaid, at this time are not cheap, if you require extended treatments for an illness, as has been his case. He has required a number of surgeries and not been able to get back to steady work. So for those who are naysayers, I say even at 2% of income, it may be too much for some. (The reason I am still working into my '70's to help pay for such things). We have met many people who take two or three cruises a year, and others who live a carefree lifestyle; so there is disposable income out there, and I think helping your fellowman out a bit is the decent thing to do.

Thompson, Jo

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From: mary.noel.olson@gmail.com
Sent: Tuesday, September 01, 2015 8:26 AM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Mary Olson

Email: mary.noel.olson@gmail.com

Comments: I support the Montana Help Act and urge the Centers for Medicare and Medicaid Services to grant the required waivers quickly. Montana is a unique state and these waivers are necessary to ensure low income Montanan's have access to health care.

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Thompson, Jo

From: jcarmody@billingsclinic.org
Sent: Tuesday, September 01, 2015 8:02 AM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form
Attachments: Jennifer Carmody.pdf

Name: Jennifer Carmody
Email: jcarmody@billingsclinic.org
Comments: See letter attached. Thanks,
Uploaded File Name: Jennifer Carmody.pdf
File Link: [Open the file](#)



2800 Tenth Avenue North
PO Box 37000
Billings, MT 59107-7000

August 26, 2015

Richard Opper
Director
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

Billings Clinic appreciates this opportunity to provide comments pertaining to the Montana application for federal waivers necessary to implement the HELP act. Billings Clinic is a fully integrated health system in south central Montana. Billings Clinic has nearly 4,000 full and part-time employees, including 450 physicians and advanced practitioners and a 285-bed acute care hospital, multiple regional clinics and a long-term care facility. We also manage 11 critical access hospitals and health care organizations in Montana and Wyoming. Billings Clinic has focused its core strategy on improvements and outstanding performance in the areas of patient safety, quality, service and value to patients and their families.

Billings Clinic supports the Department's 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.

We are very grateful that the legislature passed SB 405, ensuring that thousands of Montanans will have accessible and affordable health care in their future.

We are pleased that the waiver requests the use of a TPA model for implementing the expansion of Medicaid in MT. This model has worked well in the past for the SCHIP program. We agree with the department's assertions in the waiver regarding the merits of the TPA approach. Commercial insurance can sometimes be difficult to understand and cumbersome to implement. We encourage the committee and the department to facilitate an environment where the TPA can work closely with providers in designing a system that is easy to understand and implement for all parties, especially the newly enrolled beneficiaries.

The waiver references a single streamlined application for Insurance Affordability Programs (Medicaid, CHIP, Tax Credits) and indicates that results of this application will automatically forward eligible beneficiary information to the TPA. This process sounds very promising and we hope that this information could also be used to update and populate eligibility information accessible to providers as well.



The waiver also references the fact that some individuals may migrate between the TPA, the marketplace and/or traditional Medicaid depending on income and other factors. We were pleased to see that the state applied for Fast Track Express Lane Eligibility Waiver for continuous eligibility for all newly eligible adults. We note that changes in eligibility status occur with the traditional Medicaid population already. We would like to ensure that the State has in place a robust, electronic process for ensuring that treating providers can verify the patient's current eligibility for a more seamless billing process.

Billings Clinic is not asking for any material changes to the draft waiver requests. We support the Department's efforts and the proposals, and are prepared to provide any assistance needed to gain the approval for the waivers from the Centers for Medicare and Medicaid Services. Please contact J.J. Carmody, Director of Reimbursement and Health Policy, at jjcarmody@billingsclinic.org with any questions or to discuss our comments further.

Sincerely,

A handwritten signature in black ink that reads "Nicholas Wolter".

Nicholas Wolter, M.D.
Chief Executive Officer

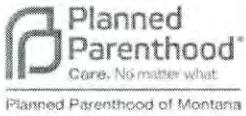
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Thompson, Jo

From: Stahl, Martha <martha.stahl@ppmontana.org>
Sent: Monday, August 31, 2015 9:50 AM
To: Thompson, Jo
Subject: Medicaid Expansion waiver comments
Attachments: HELP Program - State Comments for PPM -final 8-27-15.docx

Please find attached Medicaid Expansion waiver comments attached.

Sincerely,
Martha Stahl



Martha Stahl

President and CEO

Phone: 406.869.5017

Fax: 406.254.9330

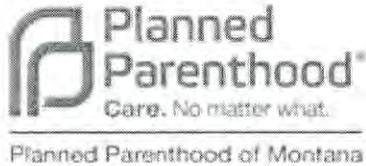
Cell: 406.876.1918



www.plannedparenthood.org/montana

Find us on Facebook: **Planned Parenthood Advocates of Montana**

Planned Parenthood of Montana (PPMONT) is a 501(c)(3) nonprofit organization. If you are having trouble viewing this email in error please notify us immediately by replying to the message and delivery is from your computer. Thank you.



August 27, 2015

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

VIA ELECTRONIC SUBMISSION (jthompson@mt.gov)

Dear Director Opper,

Planned Parenthood of Montana (“Planned Parenthood”) and Planned Parenthood Advocates of Montana (“Planned Parenthood Advocates”) are pleased to submit these comments on the proposed Health and Economic Livelihood Partnership (HELP) Program (herein referred to as the “HELP Program”). We appreciate the opportunity to weigh in on such a landmark proposal and thank the Department for seeking input from stakeholders.

Planned Parenthood has, for 50 years, provided services to low-income Montanans. Each year we serve 13,000 patients with annual exams, STI testing and treatment, cancer screenings, birth control and other preventive health care services. Many of our patients, and their families, will benefit from the expansion of Medicaid in Montana.

We strongly support the Department’s efforts to expand Medicaid coverage to individuals who have incomes up to 138 percent of the federal poverty level (FPL). Medicaid is a vital part of the health care system and plays a major role in ensuring access to essential primary and preventive care services for women, men, and young people. Low-income women, in particular, stand to benefit from the expansion of Medicaid. With greater access to Medicaid coverage, hardworking women across the state will be able to obtain health services that are critical to their health and lives, including birth control, life-saving cancer screenings, and prenatal care.

As Montana moves forward to formalize this proposal and seek federal approval, we urge the Department to ensure the HELP Program meets the unique health needs of women. Specifically, we urge the Department to implement the HELP Program in a manner that will provide individuals comprehensive health coverage that includes reproductive health services like family planning and pregnancy-related service, as well as access to the women’s health providers they trust. Properly implemented, the HELP Program will enable women to access the services they need, resulting in better health outcomes for women and their families.

I. The Department Should Ensure Access to Family Planning Services and Family Planning Providers for All HELP Program Enrollees.

We are very pleased that the HELP Program proposal will provide coverage for preventive services without any co-payment. The proposal, however, does not define preventive services. We assume the Department intends for preventive services to include both family planning services and the services provided under the Affordable Care Act (ACA) women's preventive health benefit, as that care is not only preventive, but is also required to be covered for the newly eligible population without cost-sharing under federal law.¹ Nevertheless, we urge the Department to explicitly clarify in its final proposal that HELP Program enrollees are entitled to coverage, without cost-sharing, for all family planning services and supplies covered under the state plan, all FDA-approved contraceptive methods as required under the women's preventive health benefit, and the other services provided as part of the women's preventive health benefit.

In addition, we also request explicit clarification that HELP program enrollees will retain free choice of providers for family planning services. Federal law and policy unequivocally protect a Medicaid enrollee's ability to receive family planning services from any qualified Medicaid provider, even if the enrollee is enrolled in a managed care plan.² Notably, the Centers for Medicare and Medicaid Services (CMS) has vigorously enforced the "family planning freedom of choice" protection, including in the context of 1115 demonstration waivers to expand Medicaid coverage.³ Accordingly, to ensure the HELP Program complies with federal law and provides women timely access to trusted family planning providers, we strongly urge the Department to clarify in its final proposal that it does not seek to waive section 1902(a)(23)(B) (family planning freedom of choice of providers) in seeking to waive 1902(a)(23).

II. The Department Should Ensure Timely Access to All Covered Pregnancy-Related Care for HELP Program Enrollees.

¹ 42 U.S.C. §§ 1396u-7(b)(5) (as added by ACA § 2001(c)), 1396u-7(b)(7) (as added by ACA § 2303(c)); 78 Fed. Reg. 42160, 42307 (to be codified at 42 C.F.R. § 447.347) (specifying that Medicaid benchmark coverage (coverage provided to the newly eligible population) must be consistent with Essential Health Benefit requirements set forth in 45 C.F.R. part 156); 78 Fed. Reg. 12834, 12843 (Feb. 25, 2013) ("a plan does not provide EHB unless it meets the standards in 45 C.F.R. § 147.130") (to be codified at 45 C.F.R. § 156.115(a)(4)); 45 C.F.R. § 147.130(a)(iv) (specifying coverage of the women's preventive health services that are to be available without cost-sharing); U.S. Dep't of Labor, *FAQs about Affordable Care Act Implementation (Part XXVI)* (May 2015), available at <http://www.dol.gov/ebsa/faqs/faq-aca26.html> (requiring health plans to cover, as part of the women's preventive health benefit, all 18 FDA-approved birth control methods).

² 42 U.S.C. § 1396a(a)(23)(B); 42 C.F.R. § 431.51(a)(4); CMS, State Medicaid Manual § 2088.5. ("recipient may obtain family planning services and supplies from outside of the HMO without an HMO referral, even if the HMO contracts with Medicaid to provide the same services").

³ CMS, *Healthy Pennsylvania Section 1115 Demonstration (Special Terms and Conditions)* (Aug. 2014), available at <http://www.medicare.gov/Medicare-CHIP-Program-Information/By-Topics/Waivers/1115/downloads/pa/pa-healthy-ca.pdf> ("No waiver of freedom of choice is authorized for family planning providers"); CMS, *Iowa Marketplace Choice Plan Section 1115 Demonstration (Special Terms and Conditions)* (Feb. 2, 2015) (prior approvals dated Dec. 30, 2013 and Dec. 10, 2013), available at <http://www.medicare.gov/Medicare-CHIP-Program-Information/By-Topics/Waivers/1115/downloads/ia/ia-marketplace-choice-plan-ca.pdf> ("No waiver of freedom of choice is authorized for family planning providers"); CMS, *Letter to Billy Millwee, Deputy Executive Commissioner of the Texas Health and Human Services Commission* (Dec. 12, 2011) (notifying the State of Texas that CMS will not renew the 1115 family planning demonstration waiver because Texas sought to waive freedom of choice of family planning providers); see also CMS, *Informational Bulletin* (Jun. 1, 2011) (reiterating the federal requirement that states must provide Medicaid enrollees freedom of choice of provider for family planning services); U.S. Statement of Interest at 4, 8-9, *Planned Parenthood of Indiana v. Comm'r of the Ind. State Dep't of Health*, 699 F.3d 962 (7th Cir. 2012) (cert denied) (asserting that freedom of choice is a longstanding provision, and that a State may not exclude certain providers from the Medicaid program because of a provider's scope of practice); Stephanie Armour, *States Warned Over Ending Medicaid Funds for Planned Parenthood*, Wall Street Journal (Aug. 12, 2015), available at <http://www.wsj.com/articles/hhs-warns-states-of-possible-violation-in-ending-medicaid-funds-for-planned-parenthood-1439392786>.

The Department's proposal does not detail how women who become pregnant after enrolling in the HELP Program will access care. While we assume this omission was an oversight, we urge the Department to confirm that, consistent with federal guidance, women who become pregnant after enrolling in the HELP Program will be able to choose to remain in the newly eligible group and receive pregnancy-related care through the HELP Program or transfer to the pregnant women eligibility group and receive traditional Medicaid coverage.⁴ Likewise, we also ask the Department to reinforce in its final proposal that pregnant women enrolled in the HELP Program will remain entitled to all covered pregnancy-related services, including abortion⁵, without co-payments or premiums.⁶

Moreover, it is imperative that the state have mechanisms in place that are precise and efficient to ensure that pregnant women receive care in a timely manner and are not inadvertently charged for care. We ask the Department to assure stakeholders that its Medicaid systems are able to accommodate the influx of new Medicaid enrollees and will be able to effectively facilitate care for pregnant women.

III. Premium Assistance for Employer-Sponsored Insurance Should be Limited to Plans that Meet the Essential Health Benefits.

We appreciate the Department's intent to extend the existing employer-sponsored insurance (ESI) premium assistance program to the newly eligible population. However, we want to make sure that premium assistance payments are being made to ESI that provides coverage that is at least comparable to the comprehensive coverage Medicaid enrollees would receive if they were enrolled in the HELP Program. Specifically, we ask the Department to clarify in its final proposal that ESI plans will be eligible for the ESI premium assistance program only if they cover the Essential Health Benefits, as defined under the Affordable Care Act. Without this assurance, it is possible that some individuals will be inadvertently enrolled in an employer's plan that fails to provide them minimum comprehensive coverage. Moreover, we ask the Department to confirm that ESI enrollees remain eligible for wrap-around coverage without additional cost-sharing so they are able to easily access all state plan-covered benefits not provided through their ESI, as required under federal law.⁷

IV. The Department Should Clarify Cost-Sharing Requirements to Conform with Federal Law and Amend the Healthy Behavior Incentive Structure to Ensure Equitable Access to Health Coverage.

We understand the Department must submit a proposal to CMS that reflects the HELP Act. Nevertheless, we remain strongly opposed to imposing premiums and other cost-sharing for the newly

⁴ CMS, Medicaid/CHIP Affordable Care Act Implementation Frequently Asked Questions, Q2 (May 22, 2012), available at <http://www.medicaid.gov/state-resource-center/FAQ-medicaid-and-chip-affordable-care-act-implementation/downloads/Eligibility-Policy-FAQs.pdf>.

⁵ Mont. Dep't of Public Health & Human Servs., Physician Related Services, 2.4 (Aug. 2015) (stipulating that abortions are covered when the member's life would be endangered, the pregnancy is a result of rape or incest, or when the abortion is determined to be medically necessary by the attending physician); *Planned Parenthood of Missoula v. Blouke*, 858 F. Supp. 137 (D. Mont. 1994) (enjoining enforcement of an administrative rule that would have prohibited the state from paying for an abortion unless it was necessary to protect the life of the woman).

⁶ 42 U.S.C. §§ 1396o(a)(2)(B), 1396o(b)(2)(B) (added by ACA § 4107(c)(1)), 1396o-1(b)(3)(A)(ii), (b)(3)(B)(iii); 42 C.F.R. § 447.53(b)(2); 42 U.S.C. § 1396o(c); CMS, State Medicaid Manual § 3571.5 (exempting pregnant women who have incomes below 150 percent FPL from paying premiums).

⁷ 42 C.F.R. § 435.1015(a)(2)-(3); CMS, *Medicaid and Affordable Care Act: Premium Assistance* (Mar. 2013), available at <http://medicaid.gov/Federal-Policy-Guidance/Downloads/FAQ-03-29-13-Premium-Assistance.pdf>.

eligible population, regardless of income, and terminating certain individuals from coverage if they fail to pay their premiums. The HELP Act cost-sharing requirements and termination provision contravene the purpose of having an entitlement-based Medicaid program, may make coverage cost-prohibitive, and could result in individuals delaying care or forgoing care altogether. Indeed, the “personal responsibility” hypothesis could simply exacerbate health disparities, which, in turn, could result in higher health care costs for the state.

As the Department moves forward with finalizing its proposal for CMS submission, we urge the Department to make clear that pregnant women will remain exempt from premium obligations and that no cost-sharing will be imposed on family planning services and supplies and pregnancy-related care, as required under federal law. In addition, with respect to the proposed healthy behavior incentive, we ask the Department to modify the incentive structure to include women’s health services and ensure the healthy behavior incentive is not inadvertently biased against women. For example, the Department could define participation in a health home to include a women’s medical home (a medical home comprised of women’s health care providers that provide reproductive health services). Similarly, participation in a tobacco use prevention or cessation program could extend to existing programs provided to pregnant women. Moreover, if the Department later modified the healthy behavior incentive to include a physical exam or wellness screening, as other states have, the Department could ensure that well-woman exams satisfy the incentive so that a woman only needs to complete one exam per year to maintain her incentive – similar to man – instead of having to complete two separate exams that accomplish the same purpose.

V. The Department Should Make Sure Third Party Administrator Payment Rates are Sufficient to Encourage Provider Participation.

We appreciate the Department’s intent to ensure that third party administrators (TPAs) pay rates that are comparable to rates paid under the current Medicaid program. However, to bolster provider participation rates and ensure the newly eligible population has timely access to care, we encourage the Department to require TPAs to reimburse providers at a rate that equals their highest contracted provider reimbursement rate or at a rate that matches the actual costs of care, whichever is greater. Ensuring sufficient provider participation is critical to the success of the HELP Program. By the Department’s own estimate, approximately 70,000 new individuals will be able to gain Medicaid coverage through the program. To ensure these individuals receive meaningful coverage through the HELP Program, the Department must have robust networks of providers that are able to accommodate new patients and provide care without delay.

In particular, the Department should make sure there are enough women’s health providers participating in the HELP Program. Access to women’s health providers is absolutely critical given that women are entitled to family planning services, the women’s preventive benefit, and pregnancy-related care. In addition, providing a sufficient number of women’s health providers will ensure the HELP Program reflects the unique ways women access health care. Women (in particular, low-income women and women of color) rely on women’s health providers for primary and preventive care, with 40 percent of uninsured women and 41 percent of low-income women likely to consider their OB/GYN provider their main source of care.⁸ Moreover, most women perceive their OB/GYN providers as trusted

⁸ PerryUndem Research & Communication, *Women & OB/GYN Providers* (Nov. 2013) (research conducted for Planned Parenthood Federation of America).
http://www.plannedparenthood.org/files/4914/0656/5723/PPFA_OBGYN_Report.FINAL.pdf.

providers – by a 16 point margin, women say that they are more likely to be open and honest with their OB/GYN provider than other provider type.⁹ For women, OB/GYN providers and other women’s health providers are not only sources of women’s medical care, they are also gateways to the broader health care system.

Increasing reimbursement rates is one of the most concrete ways to substantially increase provider participation and ensure women’s health providers have the capacity to meet increased patient demand. Physicians are less likely to accept new Medicaid patients compared to self-pay patients and patients with Medicare or private insurance.¹⁰ Even among Medicaid-participating providers, less than half of all primary care providers participating in Medicaid managed care programs offered appointments to patients.¹¹ Importantly, the majority of Medicaid programs often face provider shortages – particularly for specialists, including OB/GYN providers.¹² Unsurprisingly, multiple studies have concluded that low reimbursement rates contribute to this low provider participation and have suggested that higher Medicaid rates would increase the probability of providers accepting patients with Medicaid.¹³ Indeed, a recent study proved that an increased Medicaid payment rate was an effective tool in increasing the availability of appointments among existing Medicaid providers by nearly 8 percent.¹⁴

Increased Medicaid rates will likely motivate more providers to join the Medicaid program and improve existing providers’ capacities to accept new patients. At a time when the Department anticipates substantial growth in the Medicaid patient population, the Department should make reimbursement rates a top priority and ensure new Medicaid patients receive meaningful coverage that enables them to access the health care they need in a timely manner.

We thank the Department for the opportunity to submit these comments, and we look forward to working with the Department in our shared goal to improve health care access and coverage. If you have any questions please do not hesitate to contact me at 869-5017 or Martha.Stahl@ppmontana.org

Sincerely,

Martha E. Stahl

President and CEO, Planned Parenthood of Montana

⁹ *Id.*

¹⁰ U.S. Gov’t Accountability Office, *States Made Multiple Program Changes, and Beneficiaries Generally Access Comparable to Private Insurance* (Nov. 2012), available at <http://www.gao.gov/assets/650/649788.pdf>.

¹¹ U.S. Dep’t of Health & Human Servs., Office of Inspector General, *Access to Care: Provider Availability in Medicaid Managed Care* (Dec. 2014), available at <http://oig.hhs.gov/oei/reports/oei-02-13-00670.pdf>.

¹² U.S. Gov’t Accountability Office, *supra* at note 14.

¹³ U.S. Dep’t of Health & Human Servs., *supra* at note 15.

¹⁴ Daniel Polsky, PhD. et al., *Appointment Availability after Increases in Medicaid Payments for Primary Care*, *NEW ENG. J. MED.* (Jan. 21, 2015), available at <http://media.navigatore.com/documents/Polsky.pdf>.

126
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Thompson, Jo

From: Sara Brigham <ladyratsb@earthlink.net>
Sent: Thursday, August 20, 2015 5:05 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

Sara Brigham
1421 Iron Cap Dr
Stevensville, MT 59870

Thompson, Jo

125
✓ R ✓

From: JoAnn Hanson <jhansonmt@gmail.com>
Sent: Thursday, August 20, 2015 4:04 PM
To: Thompson, Jo
Subject: Support expansion of Medicaid

Dear Ms. Thompson,

I wholeheartedly support the expansion of Medicaid in Montana as approved by a bipartisan group of legislators in the 2015 Montana Legislative Session. The expansion bill may not be perfect but it is a good beginning. Most important is that thousands of Montanans will have access to health care coverage that they desperately need. It will benefit disabled Montanans, low-income Montanans, children, and families.

Thank you, JoAnn Hanson
6123 Moondance Road
Helena, MT 59601
406-449-2689

124
✓ K/J ✓

Thompson, Jo

From: pat.mcleod48@gmail.com
Sent: Thursday, August 20, 2015 1:36 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Patsy McLeod

Email: pat.mcleod48@gmail.com

Comments: I support the expansion of Medicaid via the HELP act. Many residents are working multiple self-employment jobs to support families. Medical help is vital for a healthy community. Please allow for the expansion of Medicaid.

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123
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Thompson, Jo

From: Linda Smith <blueflax@mtwi.net>
Sent: Thursday, August 20, 2015 12:42 PM
To: Thompson, Jo
Subject: Medicaid Expansion Waiver

I wholeheartedly support the Medicaid Expansion Waiver. Too many Montanans have had to wait too long for access to affordable health care. The waiver process needs to be expedited so access is achieved as soon as possible.

122
✓ K ✓

Thompson, Jo

From: Naomi Billedeaux <nomideaux@gmail.com>
Sent: Thursday, August 20, 2015 12:20 PM
To: Thompson, Jo
Subject: Waiver

I am writing to give my opinion on the waiver, as a CSKT-Tribal member I strongly agree that Medicaid expansion to low income families in Montana is crucial. I work full time for my Tribe and it is taxing for me to pay for private insurance as a single parent of 3 dependents. I rely on Tribal Health for my medical needs. This is taxing to my Tribe yet if I was allowed Medicaid I would not be taxing my local resources.

thank you for your time, if you have questions feel free to contact me.

--
Naomi Billedeaux, BA
Youth Advocate
Confederated Salish and Kootenai Tribes-Social Services Department
406.675.2700 Ext 1357
naomi.billedeaux@cskt.org
nomideaux@gmail.com

121
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Thompson, Jo

From: matt@namimt.org
Sent: Thursday, August 20, 2015 10:01 AM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form
Attachments: Matt Kuntz.pdf

Name: Matt Kuntz

Email: matt@namimt.org

Comments: Dear CMS, Please accept this letter of support for the HELP Act on behalf of NAMI Montana.

Thank you, Matt Kuntz

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120
✓ K ✓

Thompson, Jo

From: Wilma Joines <Kittenkat51@aol.com>
Sent: Wednesday, August 19, 2015 2:23 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

Wilma Joines
4000 Huntington Hills Rd
Billings, MT 59101

119
✓ K ✓

Thompson, Jo

From: Ella Robson <antiquity22001@yahoo.com>
Sent: Wednesday, August 19, 2015 1:30 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

Ella Robson
P.O. Box 243
Huntley, MT 59037

118
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Thompson, Jo

From: Irene Erdie <irene.Erdie@yahoo.com>
Sent: Wednesday, August 19, 2015 1:24 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

Irene Erdie
9017 Douglas Cir
Helena, MT 59602

117
✓K✓

Thompson, Jo

From: Amanda Boutwell <tophatamanda@yahoo.com>
Sent: Wednesday, August 19, 2015 1:23 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

Amanda Boutwell
11 Parsons Dr
Missoula, MT 59802

116
✓K ✓

Thompson, Jo

From: Dorothy Curnow <ohenrys@3rivers.net>
Sent: Wednesday, August 19, 2015 11:49 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

Dorothy Curnow
314 7th St N
Fairfield, MT 59436

115
✓K✓

Thompson, Jo

From: Rob Schrock <hightimberline@centurytel.net>
Sent: Wednesday, August 19, 2015 9:26 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

Rob Schrock
952 Ranch Ln
Kalispell, MT 59901

114
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Thompson, Jo

From: swanson <ppswanson@mt.net>
Sent: Wednesday, August 19, 2015 9:06 PM
To: Thompson, Jo
Subject: PLEASE approve waiver

To the CMS,
I feel that it is vitally important for the CMS to approve the Section115 Waiver as quickly as possible so that 70,00 more Montanans who are in need of healthcare will be covered. Please make this happen!
Thank you,
Penny Price Swanson

113
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Thompson, Jo

From: cheryl mcmillan <cmcmillan@montana.com>
Sent: Wednesday, August 19, 2015 6:24 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

cheryl mcmillan
1428 Harrison St
Missoula, MT 59802

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Thompson, Jo

From: lgeorge@buttechc.com
Sent: Wednesday, August 19, 2015 3:36 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Linda George
Email: lgeorge@buttechc.com

Comments: I want to make sure that I expressed my support for the Medicaid Expansion Waiver. Daily I see consumers who come to my office to see about insurance. They make too much for traditional Medicaid but not enough for APTC with the HIM. "Gap people." These are not couch serfers I'm speaking of here. Most of the people that I see and speak to are families holding 2 jobs with no benefits, sometimes both husband and wife have two jobs, and more and more I see folks that are taking care of their grandchildren because mom and dad are not able or willing to doing so. Because they are older and have health problems are unable to work and if they do it's not a lot. Too young for Medicare and not enough income to qualify for APTC. I also want to say that a small premium and copays are a good thing! Nothing is free...or nothing should be free.

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Thompson, Jo

From: Karen Renne <renne.karen@gmail.com>
Sent: Wednesday, August 19, 2015 3:06 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

Karen Renne
132A Hoffman Drive
Bozeman, MT 59715

✓ 110
K ✓

Thompson, Jo

From: Brenda Lynch <lynchmissoula@bresnan.net>
Sent: Wednesday, August 19, 2015 2:39 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

Brenda Lynch
3332 El Dora Lane
Missoula, MT 59803

109
✓ K ✓

Thompson, Jo

From: Jean Muir <jemuir@bresnan.net>
Sent: Wednesday, August 19, 2015 2:28 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

Jean Muir
1720 Central Ave
Great Falls, MT 59401

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✓X✓

Thompson, Jo

From: Ellen Feaver <eefeaver@hotmail.com>
Sent: Wednesday, August 19, 2015 1:45 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

The legislation passed wasn't my first choice, but it represents the best we could get from a very conservative legislative majority. If the Federal Government approves the state's plan, Montanans will figure out how to make sure the maximum number of people possible get coverage. Every person covered is significant. We have so many working families who desperately need coverage. Please help make this possible.

Thanks -

Ellen Feaver
901 Flowerree St
Helena, MT 59601

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Thompson, Jo

From: kent mollohan <kentm123@live.com>
Sent: Wednesday, August 19, 2015 1:42 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I ask you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

kent mollohan
524 S Roberts St
Helena, MT 59601

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Thompson, Jo

From: Dan Hogan <danhogan54@gmail.com>
Sent: Saturday, August 22, 2015 7:09 AM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

Dan Hogan
202 1/2 N. Haggin, Red Lodge, MT
Red Lodge, MT 59068

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Thompson, Jo

From: Pete Shea <sheapete@yahoo.com>
Sent: Thursday, August 20, 2015 7:20 PM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

Pete Shea
520 Marie Street
East Glacier Park, MT 59434



Montana Dental Association

P.O. Box 1154
Helena, Montana 59624

(406) 443-2061
Toll-free in Montana
(800) 257-4988
fax: (406) 443-1546
E-mail: info@montanadental.org
www.MontanaDental.org

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Columbia Falls, MT 59912

Executive Director

David R. Hemion

Constituent:
American Dental Association
www.ada.org

Statement by the Montana Dental Association Medicaid Expansion Waiver Request - Montana HELP Act August 20, 2015

The Montana Dental Association (MDA) supports the State of Montana's Medicaid waiver request to implement Medicaid expansion as the Health and Economic Livelihood Partnership (HELP) Act. The Association strongly urges that the Centers for Medicaid and Medicare Services approve the waiver as expeditiously as possible.

The Association appreciates the Legislature's recognition of the essential need to include provisions for dental coverage in the HELP Act. Numerous studies have shown that prevention and treatment of dental disease can result in medical cost savings, less utilization of emergency departments and reduced hospitalization. Untreated tooth decay can result in acute and spreading dental infections that threaten the body with serious, even fatal, illness. Due to systemic-oral health complications, the treatment and prevention of periodontal (gum) disease is especially important for people with type 2 diabetes, cerebral vascular disease, coronary artery disease and pregnancy.

The current Montana Medicaid program is a recognized leader nationally in providing comprehensive dental coverage for disabled, blind, elderly and other categorically-eligible individuals. The Association looks forward to further discussion with DPHHS to develop a comprehensive Medicaid dental benefit plan to secure oral health for all adults who will now be covered by Medicaid.

The MDA supports a reasonable annual maximum cost to ensure cost control and additionally is particularly supportive of the plan for preventive services to be covered outside the proposed annual maximum benefit. Preventing dental disease is an economical and wellness focused approach; as such the MDA strongly recommends that fluoride varnish and dental sealants be included under preventive services and covered, as necessary, for adults, especially for the elderly who have difficulty maintaining oral hygiene.

The MDA recommends that emergency services also be covered outside of the annual maximum benefit. This will ensure adequate funding throughout the enrollment period to treat life-threatening infections and trauma and prevent repeated costly emergency department visits that do not result in definitive care.

Thompson, Jo

132
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From: dave@montanadental.org
Sent: Friday, August 21, 2015 2:33 PM
To: Thompson, Jo
Cc: Jim Ahrens
Subject: Medicaid waiver comments
Attachments: waiver statement 8-20-15.pdf

The statement o of the Montana Dental Association in support of the waiver for Medicaid expansion are attached.
Thank you for opportunity to comment.

David R. Hemion, CAE
Executive Director, Montana Dental Association
PO Box 1154, Helena MT 59624
(406) 443-2061 (800) 257-4988 (in-state) Fax (406) 443-1546
www.MontanaDental.org

131
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Thompson, Jo

From: Vicki Tapia <victorialee37@gmail.com>
Sent: Friday, August 21, 2015 12:56 PM
To: Thompson, Jo
Subject: Waivers

Please vote to approve the waivers in order to move forward with the Medicaid Expansion Plan. It's time to cover all those people caught in the gap between earning too much for Medicaid, but unable to afford insurance on their own.

Dr. Lionel and Vicki Tapia
Billings

Thompson, Jo

130
KJ ✓

From: niteed@msn.com
Sent: Friday, August 21, 2015 12:13 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Karen Datko

Email: niteed@msn.com

Comments: I strongly urge the Centers for Medicare and Medicaid Services to approve the HELP program waiver request. Many thousands of Montanans need this service. Please do not delay. Much hard work went into the bipartisan adoption of this compromise plan to expand affordable health care to low-income Montanans. Please support it.

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File Link: [Open the file](#)

Thompson, Jo

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From: William H Clarke <wclarke440@aol.com>
Sent: Thursday, August 20, 2015 10:58 AM
To: Thompson, Jo
Subject: We need the Waiver: Help 70K MT get healthcare

Dear Ms. Thompson,

I am writing to urge you to do all that you can to help the MT Medicaid expansion waiver get approval from the Centers for Medicare and Medicaid Services.

Montana's Medicaid expansion waiver will open up access to health coverage for tens of thousands of Montanans who have been waiting for years and who desperately need this access to care.

Thousands of Montanans have shown support for the compromises and negotiations that made this policy happen. Our families, neighbors, and community members can't wait any longer for access to life saving care. I support Montana's waiver and urge the state and CMS to move as quickly as possible.

Thanks -

William H Clarke
1330 Lower Lincoln Hills Dr
Missoula, MT 59802

128
✓KJ

Thompson, Jo

From: Susan Effertz / Charles Kuether <seffertz@holmanonline.com>
Sent: Thursday, August 20, 2015 10:23 AM
To: Thompson, Jo
Subject: Medicaid Expansion for Montana

Dear Ms. Thompson,

This note is voice my intense support for Medicaid expansion in Montana.

The state legislature finally did approve a version of this plan as the HELP Act, and by this means the public's demand for this aspect of health care reform was acknowledged and set into motion. Even with the stipulations imposed on implementation of the program, as passed by the Montana legislature, Medicaid expansion will be a boon to all of us and should be implemented.

Thank you for your attention.

Susan J. Effertz, M.D.

127
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Thompson, Jo

From: richard makman <hmakman@icloud.com>
Sent: Friday, August 21, 2015 6:11 AM
To: Thompson, Jo
Subject: 1115 Waiver

Dear Ms Thompson,

I write in support of the 1115 Waiver , SB 405.

it is very important for all the citizens of Montana to have the best health care that can be provided by our medical community.

I realize that the current arrangements for health care in the public sphere are not perfect, but the speedy acceptance of the waiver is a step in the right direction.

I care because we are a community and the health care of those who cannot afford help ultimately damages the whole community particularly by taking ill people out of the work force and thus preventing them from earning a livelihood as well as adding to the burden on the public purse to support the indigent.

Sincerely, Hermine Makman

196 Fairway Boulevard

Kalispell, MT, 59901

142
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Thompson, Jo

From: Barbara Schneeman <Barbara.Sch@riverstonehealth.org>
Sent: Monday, August 31, 2015 3:28 PM
To: Thompson, Jo
Subject: RiverStone Health's comments re: Medicaid Waiver
Attachments: HELP Waiver Letter.pdf

Ms. Thompson –

RiverStone Health submits the attached as official comment regarding Montana's 1115 waiver to expand Medicaid. A hard copy was sent in last week's mail. Please let me know if you have questions. Thank you.

Barbara J. Schneeman | Vice President
Communication & Public Affairs
Public Information Office

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RiverStone Health
123 South 27th Street | Billings, MT 59101
Office: 406. 651. 6420
Mobile: 406. 671. 2663
Fax: 406. 247. 3202

.....
barbara.sch@riverstonehealth.org
www.riverstonehealth.org

Our Mission is to Improve Life, Health, and Safety

August 28, 2015

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

RECEIVED
AUG 31 2015
HEALTH RESOURCES
DIVISION

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

Dear Ms. Thompson:

Thank you for the opportunity to comment on the draft 1115 waiver application that provides the framework to enact the Health and Economic Livelihood Partnership (HELP) Act. Expanding Medicaid coverage to eligible Montanans has been a top priority for the RiverStone Board of Health and the RiverStone Health Clinic Board of Directors, as well as RiverStone Health staff. As a multi-faceted organization that includes serving as the local public health agency for our state's most populous county and primary care delivered through a federally qualified health center, there is nothing more important than access to healthcare.

The HELP Act, Senate Bill 405, was supported by an impressive cross-section of stakeholders; business organizations, healthcare providers, health advocates, financial entities, social service providers, and many others. Most importantly, numerous Montanans who would be eligible for expanded Medicaid coverage traveled to Helena to tell their stories about the impact of being uninsured. Overwhelming support was evident not only in the 2015 legislative session but many of these same individuals and organizations testified about the importance of expanding Medicaid during the 2013 session as well.

Since 2012 when the U.S. Supreme Court ruled that individual states were to make the decision to expand Medicaid, thousands of Montanans have been anxiously waiting for affordable access to healthcare. Time is of the essence and we sincerely hope that the Centers for Medicare and Medicaid Services approves Montana's waiver without delay. Should CMS waiver approval be forthcoming, RiverStone Health stands ready to not only help enroll eligible Yellowstone County residents (as we have successfully done with the Health Insurance Marketplace), but also to ensure that they have access to high quality comprehensive primary and preventive care.

Approximately 8,000 of our RiverStone Health Clinic patients have incomes below 100 percent of federal poverty. These individuals work in our hotels, convenience stores, restaurants and on farms and ranches. By expanding Medicaid coverage, these hard working Montanans will be able to get the care they need when they need it, instead of waiting for "little things" to become medical crises requiring unnecessarily costly care.

The Montana Department of Public Health and Human Services, U.S. Census Bureau Small Area Health Insurance Estimates and the Bureau of Business and Economic Research estimate that Medicaid expansion will:

- Provide nearly 70,000 Montanans (more than 7,000 Yellowstone County residents) with access to healthcare;
- Positively impact health status;
- Decrease the amount of uncompensated care to our area clinics and hospitals;
- Add 12,700 jobs per year (almost 1,400 in Yellowstone County);
- Generate \$4 billion in labor income in Montana in the first eight years; and,
- Generate \$57 million annually in labor income in Yellowstone County.

In applying for the federal waiver, and subsequently, in implementing Medicaid expansion, we respectfully request the Montana Department of Public Health & Human Services adhere to these principles:

- Act as expeditiously as reasonably possible;
- Conduct the program in a way that is sensitive to and enhances the dignity of the newly-covered population; and,
- Collaborate with local health departments and community health centers across the state to proactively reach the eligible population to ensure that the enrollment process is expeditious and effortless.

Once again, we wish to extend our support to the Department as it moves forward implementing expanded Medicaid coverage. RiverStone Health looks forward to working with the Department to enroll eligible Yellowstone County residents in the expanded Medicaid program as soon as CMS approves Montana's 1115 waiver application and the necessary pieces are in place to do so.

Thank you again for the opportunity to comment on the HELP Act 1115 waiver application. Please contact RiverStone Health's President & CEO and Yellowstone County's Health Officer, John Felton, with questions or ideas on how best we may be of assistance in Montana's effort to expand health coverage through Medicaid.

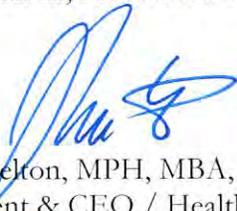
Sincerely,



Micheal Dennis, Ph.D.
Chairperson, RiverStone Health Board



Diane Duin, Ph.D.
Chairperson, RiverStone Health Clinic Board



John Felton, MPH, MBA, FACHE
President & CEO / Health Officer

141
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Thompson, Jo

From: Brent Gaylord <gaylord@3rivers.net>
Sent: Monday, August 31, 2015 8:08 AM
To: Thompson, Jo
Subject: HELP act

Please relay my support of the HELP Act Section 1115 waiver to CMS. I see this as the best vehicle to help those Montanans who currently have no health insurance. Without a CMS waiver we will probably not see medicaid expansion in Montana in the foreseeable future.
Brent Gaylord, Valier, Montana 59486

140
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Thompson, Jo

From: Abby Dawson <dawson.abby@gmail.com>
Sent: Sunday, August 30, 2015 12:36 PM
To: Thompson, Jo
Subject: medicaid

Dear Ms. Thompson,

I am writing in support of the 1115 waiver regarding SB 405, the HELP Act. The HELP Act is an important and urgently-needed policy that will allow Montana to cover 70,000 low-income Montanans through expansion of our Medicaid program.

The HELP Act addresses the need for affordable, quality health coverage for our struggling neighbors and community members. It will open up access to primary and preventative care for Montanans who have been locked out of our healthcare system. This plan will allow many Montanans to finally secure life saving and life changing care, allowing some to get back on their feet, some to get back to work, and others to have a better quality of life. This plan also offers a lifeline to community medical centers and rural hospitals that have been struggling to operate while they provide care for patients who cannot pay. These hospitals and clinics are so important to communities across our large, rural state.

I recognize that the HELP Act includes policy compromises and represents the best efforts of legislators to meet the needs of our communities. I strongly support the HELP Act and urge CMS to approve Montana's waiver as quickly as possible so that we can start enrolling people in the program.

Sincerely, Abby Dawson

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Thompson, Jo

From: sarahboyce12@gmail.com
Sent: Sunday, August 30, 2015 8:55 AM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Sarah Boyce

Email: sarahboyce12@gmail.com

Comments: I fully support Montana's Medicaid Expansion waiver.

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File Link: [Open the file](#)

138
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Thompson, Jo

From: Bob Olsen <bob@mtha.org>
Sent: Thursday, August 27, 2015 9:24 AM
To: Thompson, Jo
Cc: Dalton, Mary; Preshinger, Duane; Opper, Richard; Veazey, Tara
Subject: MHA Comment Letter Supporting DPHHS Waiver Request
Attachments: MHA Comment Letter Medicaid Expansion Waiver.docx

Jo, here is our letter regarding the waivers. Will you let me know that it transmitted and opened successfully?

Robert W Olsen

Vice President, MHA

Office: (406) 442-1911 | DL: (406) 457-8004

www.mtha.org | [Facebook](#) | [Twitter](#)



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AN ASSOCIATION OF
MONTANA HEALTH
CARE PROVIDERS

August 26, 2015

Richard Opper
Director
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

MHA, An Association of Montana Health Care Providers appreciates this opportunity to provide comments pertaining to the Montana application for federal waivers necessary to implement the HELP act. MHA is the principal advocate for the interests of members in their efforts to improve the health status of the communities they serve. MHA members include 63 hospital members, 31 members who provide long term care, 26 members who provide home health care and 23 hospice organizations. MHA membership also includes more than 1,000 Montana physicians who practice in provider-based clinical settings.

MHA supports the Department's 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. We do so for several reasons.

MHA believes that every Montanan should have access to appropriate and necessary health care services. We believe that health coverage is a major component to assure that people can access the care they need at the appropriate time and in the most appropriate setting, and receive the most cost effective treatment needed. Medicaid is a program intended under the Affordable Care Act to provide health coverage to persons whose incomes fall below 138% of the federal poverty levels.

MHA supported passage of Senate Bill 405 – the HELP act – by the 2015 Legislature. Those who supported the measure understood that Montana would have to seek a solution to increase health coverage in a fashion that addressed concerns about the limitations of the traditional Medicaid program. Among these concerns is a requirement that those covered by Medicaid participate financially in the cost of health coverage and that the new coverage is managed by the private sector to avoid growing state government. The Montana legislature considered, and rejected, bills calling for increased coverage, but without the cost sharing and private sector roles included in Senate Bill 405. Not having a Montana solution meant that low income Montanans would be left without an opportunity to secure health coverage.

Eligibility

There are an estimated 70,000 Montanans, including 20,000 American Indians, who are eligible for coverage under the HELP Act. Grass roots advocates for increased coverage adopted a slogan

saying that 70,000 Montanans can't wait for coverage. The HELP Act will cover childless adults whose income is below 138% of the federal poverty level. The Act also provides coverage to adults with children whose incomes are between 51% and 138% of FPL.

MHA supports the Department's proposal to provide continuous coverage to this population for a 12-month period. While this policy is not specified in the HELP Act the policy is consistent with legislative intent to provide a cost-effective alternative to traditional Medicaid. A continuous period of eligibility reduces the amount of 'churn' on and off from coverage, and provides a consistent basis and administratively simple method upon which to manage the details of enrollment, premium and copayment amounts as well as potential disenrollment. Finally, the policy relieves the beneficiary from the considerable burden to notify the TPA or Department of minor income changes during the coverage period.

Cost Sharing and Disenrollment

Cost sharing is required under the HELP Act as a condition of extending Medicaid coverage. Cost sharing is nothing new to Montana Medicaid. Montana has imposed cost sharing in the Medicaid program through a variety of means, including copayments, the medically needy program and the resident's share of nursing facility costs.

Montana lawmakers determined that imposing some modest cost for health care would accomplish several key goals. Beneficiaries would not see the expanded program as a free government service. Rather, persons who enroll in Medicaid would share in the cost of insurance and treatment costs consistent with all typical insureds. The HELP Act requires a 2% of MAGI premium payment for the expansion population, and 3% of MAGI cumulative copayment amount. The cost sharing required of the HELP Act is consistent with the premium and out-of-pocket costs for policies sold on the health insurance exchange to persons with incomes between 100% and 138% of the FPL.

Persons with incomes between 100 and 138% of the FPL may fare better under the HELP Act than under the exchange policies. Medicaid does not have a deductible and the copayment amounts for each service will be a modest portion of the amount paid by Medicaid.

Lawmakers included several mitigation strategies in the HELP Act to reduce the economic burden premiums and copayments may have on the poor. MHA supports these strategies since they will have the effect of making Medicaid coverage the most affordable health plan available to low income adults. Among those strategies, the HELP Act:

- Imposes no cost sharing on American Indians and Alaskan Natives as required under federal law;
- Covers those persons determined to have significant medical conditions or are determined to be medically frail (and thus may face significant financial pressures) under the traditional Medicaid program without a premium cost;
- Extends additional waiver of copayments beyond those services excluded in the current Medicaid program. Medicaid does not impose copayments on emergency services and pregnant women. Under the HELP Act there is no copayment for health screening and other wellness services.
- Protects adults with children whose incomes are below 51% of the FPL since this population is already covered under the current Medicaid population;

- Persons under 100% of FPL will not be dis-enrolled from Medicaid and will not have to pay a premium. Persons whose incomes fall between 100 and 150% of FPL will be dis-enrolled, but the HELP Act provides some exceptions.
- Montana proposes no lock-out period for unpaid premiums. An eligible person may enroll by making up delinquent premiums.

Third Party Administration

MHA supports the proposal to utilize a third party administrator to provide certain management services and pay medical claims for the Medicaid expansion population. The HELP Act intends to increase coverage for low income Montanans without unnecessarily growing state government. The waiver request should be approved since Montana already has a successful relationship for TPA services under the Healthy Montana KIDS (CHIP) program.

It is not uncommon for Medicaid programs to utilize outside contractors to perform a considerable portion of administration of the program. Most commonly, State Medicaid programs contract for Medicaid Management Information System services. In essence, this contractor is acting as a third party administrator. Montana Medicaid uses Xerox to enroll providers, pay claims and produce management reports, among other things. The HELP Act calls for using a vendor for these services as well.

The TPA envisioned under the HELP Act will provide its own network and contract with providers for 'Medicaid-like' rates. The TPA provides a fresh opportunity for a vendor to bring its own health management and wellness services to the program beyond those offered by the State.

MHA, after consultation with its members, is not asking for any material changes to the draft waiver requests. We support the Department's efforts and the proposals, and are prepared to provide any assistance needed to gain the approval for the waivers from the Centers for Medicare and Medicaid Services. Please contact me with any questions or to discuss our comments further.

Sincerely,

Robert W. Olsen
Vice President

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✓ KJ
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Thompson, Jo

From: bobkaiser1@yahoo.com
Sent: Wednesday, August 26, 2015 8:14 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Robert Kaiser

Email: bobkaiser1@yahoo.com

Comments: Dear Ms. Thompson, I am writing in support of the 1115 waiver regarding SB 405, the HELP Act. The HELP Act is an important and urgently-needed policy that will allow Montana to cover 70,000 low-income Montanans through expansion of our Medicaid program. The HELP Act addresses the need for affordable, quality health coverage for our struggling neighbors and community members. It will open up access to primary and preventative care for Montanans who have been locked out of our healthcare system. This plan will allow many Montanans to finally secure life saving and life changing care, allowing some to get back on their feet, some to get back to work, and others to have a better quality of life. This plan also offers a lifeline to community medical centers and rural hospitals that have been struggling to operate and also provide care for patients who cannot pay. These hospitals and clinics are so important to communities across our large, rural state. I recognize that the HELP Act includes policy compromises and represents the best efforts of legislators to meet the needs of our communities. I strongly support the HELP Act and urge CMS to approve Montana's waiver as quickly as possible so that we can start enrolling people in the program. Sincerely, Robert Kaiser

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Thompson, Jo

From: Cheryl Crawley <cherylcrawley@gmail.com>
Sent: Wednesday, August 26, 2015 11:00 AM
To: Thompson, Jo
Subject: Support for Medicaid Expansion Waiver
Attachments: IMG_20150826_0001.pdf

Please find letter attached.

Cheryl Crawley, PhD
Education Leadership
Great Falls, Montana
cherylcrawley@gmail.com

612 Linden Drive
Great Falls, Montana 59404
August 19, 2015

RECEIVED

AUG 27 2015

HEALTH RESOURCES
DIVISION

- also sent via email -

Jo Thompson
P.O. Box 2029551
Helena, MT 59602-2951

To Whom It May Concern:

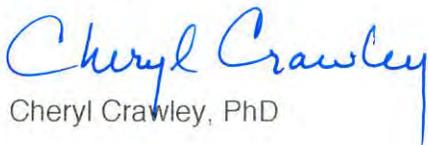
SUPPORT FOR MONTANA MEDICAID EXPANSION SECT 1115 WAIVER PLAN

Please accept this letter in support of Montana's bipartisan legislation to increase access to health care for thousands more Montana residents.

As a lifelong educator, school district administrator and superintendent, I can testify to the importance of basic health care for families, and their children, working to gain capacity as productive, supportive citizens of our Montana communities.

Medicaid expansion is one of our most basic needs and I whole-heartedly support it.

Sincerely,


Cheryl Crawley, PhD

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Thompson, Jo

From: ronburnam@gmail.com
Sent: Sunday, August 23, 2015 2:45 PM
To: KWallis@manatt.com; Thompson, Jo
Subject: Medicaid Expansion (HELP ACT) online public comment form

Name: Ronald Burnam

Email: ronburnam@gmail.com

Comments: I am very much in favor and supportive of Medicaid expansion in Montana. We have too many people who are unable to afford insurance and who do not qualify for traditional Medicaid. As a physician who has practiced in Montana for nearly 40 years, I am very aware of people who have felt unable to access the healthcare system financially, and wait until their problem becomes acute and often incurable. Ronald E Burnam M.D. FCCP

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