



The Honorable Alex Azar
Secretary, U.S. Department of Health & Human Services
200 Independence Avenue, SW
Washington, DC 20201

October 26, 2018

Re: Healthy Michigan Plan Section 1115 Demonstration Waiver Extension Request Amendment

Dear Secretary Azar:

Thank you for the opportunity to comment on Michigan's Section 1115 Demonstration Waiver Extension Request Amendment. The Cystic Fibrosis Foundation writes to express our continued concern that work and community engagement requirements, lockout periods, and increased premiums are barriers to accessing the high-quality care that people with CF need.

Cystic fibrosis (CF) is a life-threatening genetic disease that affects over 1,100 people in Michigan and 30,000 children and adults in the United States. CF causes the body to produce thick, sticky mucus that clogs the lungs and digestive system, which can lead to life-threatening infections. As a complex, multi-system condition, CF requires targeted, specialized treatment and medications. Medicaid plays an important role in helping this patient population access the high-quality care and treatment necessary to maintain or improve health.

We appreciate Michigan's decision to automatically exempt people with CF from work requirements, lock-out periods, and premiums. This recognition reflects the important reality that health status can significantly affect an individual's ability to search for and sustain employment, as well as the importance of continuous Medicaid coverage for those with serious chronic conditions like CF. While we are grateful for this exemption, we remain concerned for those who may not be captured by the state's algorithm or newly enrolled people with cystic fibrosis who might experience barriers to enrollment.

New enrollees or individuals not automatically captured by the state's algorithm will need to apply for an exemption but may not understand the process or requirements, putting their health at risk should they end up locked out of coverage. As we have seen in the September 2018 report from the Arkansas Works program, nearly 82 percent of those required to log-in and report compliance with the work requirements failed to do so, putting these individuals at risk for loss of coverage. In fact, after only four months, 8,462 people have lost Medicaid coverage for the remainder of 2018.¹ This underscores the concern that many people may have trouble understanding or complying with new eligibility requirements, including how to apply for an exemption for which they may be eligible. And for someone with CF, this could result in a life-threatening gap in coverage.

¹ Arkansas Works Program, September 2018 Report. Available:
http://d31hzhk6di2h5.cloudfront.net/20181015/d9/50/39/04/d3b5bd23a6cef7ccec3e4716/101518_AWreport.pdf

Continuous access to high-quality, specialized CF care is essential to the health and well-being of people with cystic fibrosis. Making work a condition of Medicaid eligibility and increasing premium payments threatens access to care for people with CF, as people may not be able to afford higher premiums and their ability to work can vary with changes in health status. Implementing lock-out periods for those who failed to meet reporting requirements or make premium payments further penalizes those who need care the most.

The Cystic Fibrosis Foundation appreciates the opportunity to provide input on these important policy changes. As the health care landscape continues to evolve, we look forward to working with the state of Michigan to ensure access to high-quality, specialized CF care and improve the lives of all people with cystic fibrosis.

Sincerely,

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