



July 16, 2018

Nick Lyon
Director
Michigan Department of Health and Human Services (MDHHS)
333 S. Grant Avenue
Lansing, MI 48913

Dear Director Lyon:

Our organizations write to ask you to revise and reopen the public comment period for 30 days for the Section 1115 Demonstration Extension Application for the Healthy Michigan Plan (HMP) released on July 9, 2018, as it fails to meet federal public notice and comment requirements for Section 1115 waivers.

The undersigned organizations represent millions of individuals facing serious, acute and chronic health conditions across the country and in Michigan. Our organizations have a unique perspective on what individuals need to prevent disease, cure illness and manage serious and chronic health conditions. The diversity of our groups and of those we represent enables us to draw upon a wealth of knowledge and expertise and serve as an invaluable resource regarding any decisions affecting the Medicaid program and the people that it serves.

The federal rules at 431.408 pertaining to state public comment process require at (a)(1)(i)(C) that a state include an estimate of the expected increase or decrease in annual enrollment and expenditures if applicable. The intent of this section of the regulations is to allow the public to comment on a Section 1115 proposal with adequate information to assess its impact. However, on pages 14-15 of this demonstration proposal, the Department reuses budget neutrality estimates from an earlier proposal that are no longer relevant and states that "MDHHS expects

annual HMP enrollment to decrease but the total number of beneficiaries who will be impacted is unknown at this time.” However, in order to meet these transparency requirements, Michigan must include these projections and their impact on budget neutrality provisions.

Again, we request that you revise the waiver and include this information so that the public has an opportunity to comment on this important issue with adequate information.

Sincerely,

American Cancer Society Cancer Action Network
American Diabetes Association
American Heart Association
American Lung Association
Chronic Disease Coalition
Epilepsy Foundation in Michigan
Hemophilia Federation of America
Hemophilia Foundation of Michigan
Leukemia and Lymphoma Society
Lutheran Services in America
National Multiple Sclerosis Society
National Organization for Rare Disorders
March of Dimes