



EVERTHRIVE ILLINOIS

Formerly Illinois Maternal and Child Health Coalition

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EverThrive Illinois, formerly Illinois Maternal and Child Health Coalition, works to improve the health of women, children, and families over the lifespan through community engagement, partnerships, policy analysis, education, and advocacy. Since our founding, EverThrive Illinois has been an ardent supporter of Medicaid and has fought to expand and improve the program in Illinois at many junctures in our 25 year history. We appreciate the efforts of the state to include stakeholders throughout the process of developing the Path to Transformation Illinois 1115 Waiver Proposal and respectfully submit the following comments.

1. The state of Illinois is in various stages of preparation and implementation for large scale health care delivery transformation for low income and vulnerable Illinois residents. However, there are concerns that in such a major proposal, insufficient attention is being paid to the health and health care delivery system needs of women, children, and families who are not medically high-risk or who do not have complex medical and behavioral needs. While we are pleased to see commitment in the waiver to sustaining and expanding the Family Case Management Program and Maternal, Infant, and Early Childhood Home Visiting Program, we believe more can and should be done to improve social and health outcomes for all women and children, particularly in the vein of improving public health. **We continue to request the development of a section in the proposal devoted to a series of recommendations on maternal and child health and the inclusion of maternal and child health stakeholders in implementation.**
2. **We recommend that evidence-based screening, counseling and treatment for domestic and sexual violence be included in the Medicaid reimbursable service package under this waiver.** If a Medicaid recipient has experienced this type of violence, it will affect their health outcomes overall in the same manner as homelessness, trauma and mental illness. Therefore, domestic and sexual violence should be considered as a social determinant of health requiring access to integrated

community-based domestic and sexual violence services along with physical health care services. In order to include screening for a history of domestic and sexual violence during a routine medical visit, it is recommended that domestic and sexual violence screening by health care professionals be covered in the Medicaid coverage package for all recipients. Although domestic violence screening and mental health treatment are included in the Essential Health Benefits and thus in the Alternative Benefit Package for Medicaid, the details on screening and treatment utilization guidelines are largely left up to the individual state. Illinois has a unique opportunity here to include and expand screening and treatment for these issues in the 1115 waiver to ensure that mental health and other health treatment providers are able to bill Medicaid for screening and counseling services and that providers who provide these services will be included as an important health partner in the creation of managed care/care coordination entities. In doing so, Illinois should include, as reimbursable Medicaid services under this waiver, screening and treatment for all acts of domestic violence (as defined in Section 103 of the Illinois Domestic Violence Act, 750 ILCS 60/ by a household or family member as defined in Section 103 of the Illinois Domestic Violence Act) and all sexual offenses (as defined in the Illinois Criminal Code of 2012 Article 11 and Sections 12-7.3, 12-7.4, and 12-7.5.)

The development of the Path to Transformation Waiver has required significant commitment of time and resources from the state and many stakeholders and we recognize that the details of implementation are part of a longer negotiating process with the federal government. We appreciate the efforts of the state to be transparent throughout this process and to continue to allow as many opportunities for input from consumers, providers, and legislators as possible and we hope that this will continue throughout implementation. **We agree with other advocates and providers who have commented that care must be taken to ensure that no harm is done to current services and supports which are working well. Student health centers are an example of such services.** We believe that a transparent process, which includes all stakeholders, can ensure that consumers do not lose any necessary services and supports.

If you have any questions, please contact Kathy Waligora, Manager, Health Reform Initiatives at kwaligora@everthriveil.org or 312-491-8161 x29.