

January 30, 2015

Angela Garner
Deputy Director
Division of State Demonstrations and Waivers
Center for Medicaid and CHIP Services, CMS
7500 Security Boulevard, Mail Stop S2-01-16
Baltimore, MD 21244-1850

**Re: Drug Medi-Cal Organized Delivery System Waiver
(Proposed CA Amendment No. 11-W-00193/9)**

Dear Ms. Garner:

I am writing as a patient of Aegis Treatment Centers, LLC located in Modesto California. I want to express my serious concerns about the potential harm that the above-mentioned Drug Medi-Cal Organized Delivery System Waiver could cause to my recovery, as well as the recovery of thousands of others that are at a vulnerable point in their lives.

My concern, relates to the potential loss of the federal protections that have been in place for over two decades as it relates to Drug Medi-Cal treatment services. If CMS grants California counties the authorities proposed by the Waiver, there are real concerns about great delays and possibly denial of narcotic treatment services, despite the life-saving nature of these treatment services.

The waiver appears to give counties enormous power in approving and terminating provider contracts, as well as limit access to methadone treatment services. This could interrupt services that I and many other patients require on a daily basis. The counties could potentially make these decisions simply because they are opposed to methadone treatment itself, and justify it under the other reasons that are permitted under the Waiver.

As CMS well knows, patients at narcotic treatment facilities suffer a great deal of discrimination and the protections that are being waived by the Waiver are very necessary. To grant the Waiver is to ignore the reality of the stigma and ignorance that still affects me and my peers, as well as the very good chance that such factors will be there if counties take control after the waiver.

For all of the above reasons, and the many other reasons that CMS have also been presented, I request that narcotic treatment programs be exempted from the Organized Delivery System waiver.

Sincerely,

Jessica B.