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of Health Plans

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October 1, 2015

The Honorable Sylvia Mathews Burwell  
Secretary, U.S. Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, DC 20201

Dear Secretary Burwell:

On behalf of the members of the Michigan Association of Health Plans, (MAHP), we are writing to express our strong support for long-term continuation of the Healthy Michigan Plan (HMP). This Affordable Care Act Medicaid expansion program, implemented under federal waiver in April 2014, has experienced unprecedented success, surpassing all enrollment projections, and is currently covering about 600,000 low-income Michigan residents who can now take control of their health. To meet the requirements of the law that established the Healthy Michigan Plan, the Michigan Department of Health and Human Services, MDHHS, has submitted the required waiver request for your approval to continue the program after April 30, 2016. **We are supporting the approval of Michigan's second waiver with the understanding that there are safeguards and protections for beneficiaries.**

MAHP member health plans have worked collaboratively with the MDHHS from the beginning in the development of the policy and the implementation of the Healthy Michigan Plan. Formal meetings are convened by the MDHHS on a regular basis to discuss the policies and resulting operations of the Healthy Michigan Program. Informally, there have been many additional interactions with various health plans to assure that the needs of Michigan's Medicaid beneficiaries continue to be met. MDHHS has been very willing to listen to member concerns and to seek solutions when issues are identified. Further, many of the successful policies put into place for the Healthy Michigan Plan have been extended to reach the traditional Medicaid program thus utilizing the innovations for all programs. We have enjoyed a continuing productive relationship with the former Medicaid Director, Mr. Steve Fitton until his retirement earlier this year, with Ms. Kathy Stiffler, the current Acting Medicaid Director, and we look forward to continuing this relationship with Mr. Chris Priest, the new Medicaid Director when he takes office in several weeks.



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We recognize that the provisions of this second waiver will impact only a small percentage of the program enrollees, but without approval of the second waiver, the program would end for all 600,000 current enrollees due to the stipulations of the state law creating the Healthy Michigan Program. In any given month, only 15% to 18% of enrollees have incomes greater than 100% of the federal poverty level and would be affected by the second waiver. Further, the number of HMP enrollees who are exempt from cost sharing or who have 48 cumulative months of enrollment will reduce the number of impacted enrollees even more.

This is clearly new direction for the Michigan Medicaid program and naturally there are concerns that have been raised by various groups and organizations. We fully expect that these concerns will be the subject of terms and conditions for this waiver that will enable the program to continue while providing strong safeguards for Healthy Michigan Plan enrollees to have affordable and accessible coverage.

Finally, we wish to note that the Michigan Association of Health Plan members are committed to continue working with the Department to ensure this critical program provides comprehensive affordable coverage to low-income Michigan residents and look forward to your approval of this waiver to ensure that opportunity.

We are pleased to have the opportunity to comment as well as this public opportunity to support this very successful program and to reaffirm the position of the Michigan Association of Health Plans members that **we are strongly supporting Michigan's second waiver which will provide healthcare for Michigan's most vulnerable citizens.**

Sincerely,

Dominick Pallone,  
Deputy Director

CC: Kathy Stiffler, Interim Medicaid Director  
Medical Services Administration

Chris Priest, Incoming Medicaid Director  
Medical Services Administration