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October 2, 2015

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

**Re: Healthy Michigan Section 1115 Waiver Amendment**

Dear Secretary Burwell:

Blue Cross Complete (BCC) appreciates the opportunity to review and provide comments on the Healthy Michigan Section 1115 waiver amendment request. BCC is a Medicaid health plan jointly owned by Blue Cross Blue Shield of Michigan and AmeriHealth Caritas, and serves over 80,000 Medicaid and Healthy Michigan members in three Southeastern Michigan counties.

We enthusiastically support Michigan's recent Section 1115 waiver amendment request. The Healthy Michigan Plan is a critical source of coverage for approximately 600,000 Michigan residents, many of whom were previously uninsured and lack other affordable sources of coverage.

As one of the Medicaid health plans serving the Healthy Michigan population, we have experienced firsthand the program's positive impact on our membership. In only two years of operation, Healthy Michigan with its unique focus on consumer engagement and healthy behaviors has:

- Helped connect our members to a medical home, where they are receiving key preventive services such as colonoscopies and mammograms
- Broken down barriers to routine dental care
- Seen lower inpatient admission rates for chronic disease compared to traditional Medicaid managed care populations
- Resulted in the majority of beneficiaries who have completed a Health Risk Assessment (HRA) agreeing to address health risk behaviors

Anecdotally, the program is receiving great reviews from many customers who have never had insurance before. We have not noticed any trends indicating a difficulty accessing services. In fact, more than half of the Healthy Michigan population completed a primary care visit in the first five months of enrollment in the program.

As you are aware, Healthy Michigan far exceeded the state's initial enrollment expectations and was created with strong bipartisan support. We appreciate the flexibility the Department of Health and Human Services (HHS) has already provided, and urge HHS to continue to recognize the importance of this program to some of the state's most vulnerable populations. Please grant this Section 1115 waiver amendment request.

Sincerely,

*Deirdre M. Chan*