



February 10, 2016

Vikki Wachino, Deputy Administrator and Director  
Center for Medicaid and CHIP Services  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

Dear Ms Wachino:

Intermountain Healthcare supports the State of Utah's request to extend the Primary Care Network (PCN) Demonstration. Thousands of Utahns currently receive their healthcare through services made available under the Demonstration's authority. It is important that their coverage continue beyond February 2016.

The PCN's limited-benefit package of primarily preventive care services provides much-needed access to healthcare for the enrolled population. Although the majority receiving coverage under the Demonstration receive a limited-benefit package of services, many are enrolled in employer-sponsored insurance (ESI) or through COBRA coverage. The Demonstration also allows for CHIP-eligible children to enroll under a parent's ESI plan.

As the State of Utah continues its deliberations about extending healthcare coverage to low-income individuals not currently eligible for government-sponsored programs, the PCN remains an important part of the State's healthcare coverage safety net. If the State does, at some point in the future, decide to extend healthcare coverage beyond current eligibility or benefits levels, it is important to consider that there are still several programs offered under the Demonstration that still would be important to retain—the premium assistance of ESI and COBRA plans, as well as allowing CHIP-eligible children to enroll in a parent's ESI coverage. These are important factors supporting the re-authorization of the PCN Demonstration.

Thank you for this opportunity to comment on the importance of the re-authorization.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Hales", written in a cursive style.

Michael Hales  
Senior Planning Consultant