



Public Comments to CMS Arkansas Works 1115 Waiver Extension Application

Thank you for the opportunity to provide the following comment on the Arkansas 1115 Waiver Extension.

Section V – Financial Data. The financial data section should be presenting appropriate historical and projected expenditures for the waiver extension. However, the waiver extension data presented in Appendix A with the accompanying narrative in Section V are based on the original hypothetical enrollment and cost assumptions for budget neutrality purposes. We respectfully request the consideration of revising the hypothetical population assumptions with the actual historical experience for 2014-2016 (projected) and to rebase the projections for the waiver extension on actual enrollment and utilization as provided for in the existing 1115 Demonstration, Special Terms and Conditions, Section 68.

Finally, we encourage a careful review of the trend assumptions using both historical data and actuarial projections, as well as appropriate comparison for the unique design of the Arkansas program versus other reference states. Underlying medical cost trends are higher than originally expected for many states across the country and it's important to assure sound rates and sustainable funding.