



Jennifer Kostasich, Project Officer  
Division of Medicaid Expansion Demonstrations  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

September 12, 2016

RE: Comments on 1115 Demonstration Amendment NH Health Protection Program Premium Assistance project #11-W-00298/1

Ms. Kostasich:

Thank you for the opportunity to comment on 1115 Demonstration Amendment NH Health Protection Program Premium Assistance project #11-W-00298/1. The continuation of the NH Health Protection Program is important to Housing Action NH and its member organizations. We would like to share our opposition to the proposed enhanced requirements regarding citizenship verification.

*Citizenship Verification*

Although we appreciate the intent to ensure compliance with Medicaid eligibility, the proposed requirements in the waiver would create a significant burden on NH's homeless population. Individuals and families experiencing homelessness are some of the most vulnerable people in our state. NH's homeless often have very little income and significant health challenges, including severe mental illness and substance use disorders. Given their inherent day-to-day instability it is often challenging for them to secure one form of identification. Requiring two forms of identification will certainly challenge their ability to access Medicaid coverage and thus create an undue burden to access the NH Health Protection Program.

The stress of instability and/or living in places unfit for human habitation can exacerbate health challenges and generate high public costs through law enforcement and uncompensated health care delivery. Since the launch of the NH Health Protection Program, we know that almost 4,300 people who have used NH's homeless shelter system<sup>1</sup> have been successfully enrolled in Medicaid. Access to health care in addition to supportive housing services<sup>2</sup> can transition the homeless to secure living environments and significantly improve health outcomes and decrease public costs. We urge you to modify the citizenship verification requirements to ease entry for those with no access to proof of citizenship.

Thank you for your consideration.

Sincerely,

Elissa Margolin, Director  
Housing Action NH  
603.828.5916

***About Housing Action NH:** Housing Action NH is a diverse coalition of 80 organizations and businesses that advocate for state and federal policies and investments that preserve and increase the supply of affordable housing and help end homelessness in New Hampshire.*

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<sup>1</sup> CSH is currently working with staff from New Hampshire's Department of Health and Human Services (DHHS) to analyze Homeless Management Information System (HMIS) and Medicaid Management Information Systems (MMIS) in order to provide detailed Medicaid expenditure data for beneficiaries identified as homeless in Medicaid claims data. Preliminary data indicate in SFY 2015, 4,296 people enrolled in New Hampshire's Medicaid program reported experiencing homelessness in at least one or more months during the year.

<sup>2</sup> *Housing is seen as missing link in opioid crisis*, Boston Globe, July 19, 2016

<http://www.bostonglobe.com/metro/2016/07/19/the-missing-link-combatting-opioid-crisis-housing/WgLEnP9mto0j4KDjd4abBK/story.html?event=event25>