



September 16, 2016

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

Dear Secretary Burwell,

The New Hampshire Fiscal Policy Institute (NHFPI) respectfully submits the following comments regarding the Draft Section 1115 Demonstration Amendment for the New Hampshire Health Protection Program (NHHPP) Premium Assistance.

The NHHPP has been a very successful program and it is making a difference in the lives of thousands of Granite Staters. At the present time, nearly 50,000 residents are enrolled in the program. Additionally, 57,000 individuals have accessed coverage since the program's inception in 2014, evidence that the NHHPP is working as intended. The NHHPP is essential to ensuring economic stability for New Hampshire's low-income residents, and it is important that the program continue without additional barriers that could limit access to health care.

The following comments pertain to specific elements of the 1115 Demonstration Amendment:

Waiver of Comparability: The waiver of comparability for medically frail enrollees will promote access to care for these individuals by eliminating the cost-sharing charged to individuals enrolled in the marketplace plans. This is a positive addition to the NHHPP and we urge you to approve this element of the program.

Work Requirements: The purpose of the NHHPP and Medicaid in general is to ensure eligible individuals have access to affordable coverage to address health needs. The purpose of the 1115 waiver process is to promote the objectives of the Medicaid program; not only do work requirements not promote the program objectives, they may create barriers to care. Health concerns themselves may prevent individuals from participating in work. Providing individuals with access to care enables them to access appropriate and necessary medical care to address health needs, which in turn enables the individuals to return to work and provide for their families. Work requirements would create unnecessary barriers to care and should be rejected.

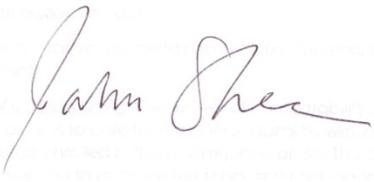
Citizenship and Residency Verification: These provisions would present a barrier to care that may be insurmountable for some low-income Granite Staters who may not have access to the necessary documents or the financial resources to purchase various forms of identification, such as a driver's license or passport. Importantly, individuals who may be homeless, and who therefore do not have a place of residence, would be unable to access the care they need, which would make it even more difficult for them to find or maintain employment and acquire the necessary income to secure stable housing.

The U.S. Department of Health and Human Services and the New Hampshire Department of Health and Human Services together have played important roles in the success of the NHHPP, and we applaud your collective efforts to ensure the program meets the objectives of the expanded Medicaid program.

New Hampshire is making great strides in improving the health of its residents and the NHHPP is an important element to ensure continued success. It is essential that the NHHPP continue for the benefit of the thousands of Granite Staters who rely on it for coverage, without establishing unnecessary and potentially harmful barriers to care.

Thank you for taking these comments into consideration. If you would like any additional information, please contact me at 603-856-8337, ext. 1, or jshea@nhfpi.org.

Sincerely,

A handwritten signature in black ink that reads "John Shea". The signature is written in a cursive style with a long, sweeping underline.

John F. Shea
Executive Director