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November 14, 2016

Mr. Andy Slavitt, Acting Administrator
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 2124

Dear Mr. Slavitt:

On behalf of the Cook County Health and Hospitals System (CCHHS), thank you for the opportunity to share comments on the State of Illinois' 1115 Medicaid waiver application.

CCHHS is one of the largest public health care systems in the United States, providing a range of services regardless of a patient's insurance status or ability to pay.

CCHHS includes 2 hospitals; 15 community health centers; the Cook County Department of Public Health which serves most of suburban Cook County; correctional health at the Cook County Jail and Cook County Juvenile Temporary Detention Center; 4 Regional Outpatient Centers (ROCs) that provide primary and specialty care, as well as outpatient diagnostic and therapeutic services, including the CORE Center for persons living with HIV and other infectious disease; and CountyCare, one of the largest Medicaid health plans in Cook County.

CCHHS serves approximately 300,000 unique patients annually through more than 1 million outpatient visits and more than 20,000 inpatient hospital admissions.

CCHHS recognizes the importance of addressing behavioral health for our patients, our health plan members, and the residents of Cook County, and commends the State of Illinois for their 1115 waiver focused on improving the provision of behavioral health services in Illinois.

Data from Stroger Hospital's Emergency Department (ED) show that 14% of ED visits and 16% of inpatient visits are attributable to addiction. And nearly a quarter of the detainees at the Cook County Jail have been identified by our staff with some level of behavioral health need. To help address these issues, CCHHS has prioritized behavioral health, including community-based efforts in our new three-year strategic plan and in our 2017 budget.

Integrated Health Homes

We are encouraged by many of the provisions outlined in the proposed 1115 waiver, as many align with the direction that CCHHS is already taking to address the behavioral health needs of Cook County residents.

CCHHS agrees with the state's approach to integrate physical and behavioral health services. This is an effort that CCHHS has already begun to undertake at our 15 community-based health centers, where we have established multi-disciplinary teams of providers to identify and address patients' behavioral health needs. Illinois' proposal for Integrated Health Homes offers the opportunity for providers to work together to address behavioral health and also helps reduce the stigma of seeking out such services.

CCHHS looks forward to sharing our experiences with others participating in the Integrated Health Homes initiative, and also learn from others implementing this model.

Supportive Housing and Employment Services

CCHHS appreciates the state's recognition of addressing social determinants as key to health improvement, and commends the state for including pre-tenancy and tenancy support services and supported employment services as expanded Medicaid benefits.

We applaud the state for clarifying that persons with Severe Mental Illness (SMI) or a primary diagnosis of Substance Use Disorder (SUD) could be eligible for the supportive housing services pilot. Expanding the ability for additional at-risk or near-at-risk individuals will allow those on the cusp of a behavioral health crisis to receive necessary supports that can help avoid more costly treatment and services at a future time.

We request that health care coordinators be given an opportunity to deliver some or all of the supportive services outlined in Exhibits 12 and 13 of the waiver application.

Transitions from Illinois Department of Corrections and Cook County Jail

We applaud the state for recognizing the important role of the Cook County Jail and the Illinois Department of Corrections as places where care coordination can and should be initiated for successful re-entry into the community.

CCHHS serves as the provider of comprehensive correctional health care at the Cook County Jail, including primary care, psychiatric visits, dental visits, detox, radiology and other diagnostic services, and prescription drugs. All of these services are documented in CCHHS' electronic health record system, so our providers in the community can see the treatment history of a person who received services in the Jail.

As such, CCHHS supports the waiver provision that would automatically and passively enroll those leaving Cook County Jail into the CountyCare Medicaid health plan, which is CCHHS' provider-led managed care plan. This will provide continuity of care for detainees leaving the Jail, allowing CCHHS/CountyCare to immediately activate care coordination services, including assisting with medical and behavioral health appointments, and screening for and addressing social determinants such as food and housing.

CCHHS appreciates the inclusion of the Cook County Jail as an eligible entity to implement Medicaid covered extended-release, injectable naltrexone medication-assisted treatment (MAT).

In conclusion, CCHHS strongly supports the State of Illinois' 1115 waiver application and looks forward to working with the state towards effective implementation that results in improved outcomes for individuals with behavioral health needs. Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Doug Elwell". The signature is fluid and cursive, with the first name "Doug" and last name "Elwell" clearly legible.

Doug Elwell
Deputy CEO, Finance and Strategy
Cook County Health and Hospitals System