



August 22, 2018

Amela Alibasic
Iowa Department of Human Services
Hoover State Office Building 5th Floor
1305 E. Walnut Street
Des Moines, IA 50319

RE: Public Notice: Comment Period to Amend Iowa's 1115 Demonstration Waiver

Submitted electronically to aalibas@dhs.state.ia.us

Dear Ms. Alibasic,

UnityPoint Health appreciates the opportunity to provide input on the proposal to reinstate the provision of three (3) months of retroactive benefits for applicants who are residents of a nursing facility at the time of application and are otherwise Medicaid-eligible. As proposed, coverage for eligible Medicaid applicants will become effective on or after the first of the month following approval of the waiver amendment by CMS. **UPH enthusiastically supports this benefit reinstatement.**

As background, this amendment reinstates a benefit eliminated in 2017 as part of a "Cost Containment Strategy" within subsection 15(a)(7) of the Health and Human Services Appropriations Bill (House File 653) of the Iowa Legislature.¹ The 2017 amendment applied to all Iowa Medicaid eligibility groups that had previously been receiving three months of retroactive benefits, with the exception of pregnant women (and during the 60-day period beginning on the last day of the pregnancy) and infants under one year of age. The stated goals and objectives were "to reduce program costs, while ensuring that mechanisms, such as presumptive eligibility and retroactive coverage for the month in which the Medicaid application is filed, are in place to guarantee individuals have continued access to necessary services."² UPH opposed the 2017 amendment to eliminate the three-month retroactive benefit for all Medicaid eligibility groups, including nursing facility residents.

¹ House File 653 (2017), Subsection 15(a)(7) – "Elimination of the three-month retroactive Medicaid coverage benefit for Medicaid applicants effective October 1, 2017. The department shall seek a waiver from the centers for Medicare and Medicaid services of the United States department of health and human services to implement the strategy. If federal approval is received, an applicant's Medicaid coverage shall be effective on the first day of the month of application, as allowed under the Medicaid state plan."

² "Notice of Iowa Department of Human Services Public Comment Period to Amend the 1115 Demonstration Waiver", published at <https://dhs.iowa.gov/public-notices> on June 27, 2017.

We stand behind the reasoning in our original comment letters³ and believe that retroactive eligibility should be returned to its former state (pre-2017 amendment). While we support the current proposal, we do not agree that other Medicaid-eligible populations fall outside “the unique concerns and needs of the nursing facility population.” In general, the elimination of this benefit has hampered access to coverage for children and disabled adults in Iowa.

UnityPoint Health (UPH) is one of the nation’s most integrated healthcare systems. Through more than 30,000 employees and our relationships with more than 290 physician clinics, 38 hospitals in metropolitan and rural communities and home care services throughout our 9 regions, UPH provides care throughout Iowa, Illinois and Wisconsin. On an annual basis, UPH hospitals, clinics and home health provides a full range of coordinated care to patients and families through more than 6.2 million patient visits. In Iowa, UPH is the largest healthcare provider.

We urge the timely approval of this proposed amendment. On behalf of our Medicaid patients and their families and caregivers in Iowa, UnityPoint Health appreciates the opportunity to provide input in response to the public notice. To discuss UPH comments or for additional information on any of the addressed topics, please contact Sabra Rosener, Vice President, Government & External Affairs at sabra.rosener@unitypoint.org or 515-205-1206.

Sincerely,



Sabra Rosener, JD
VP, Government & External Affairs

³ UPH letter to Brian Neale at Center of Medicaid & CHIP Services, CMS, “Public Comment: Iowa Health and Wellness Plan §1115 Demonstration Amendment (Project Number 11-W-00289/5)” dated September 7, 2017; UPH letter to Anna Ruggle at Iowa Department of Human Services, Iowa Medicaid Enterprise, “Public Notice: Regarding Retroactive Benefits amendment to the §1115 Iowa Demonstration Waiver” dated July 27, 2017.