



July 27, 2023

The Honorable Xavier Becerra
Secretary
U.S. Department of Health and Human Services
200 Independence Ave, SW
Washington, DC 20201

Re: Illinois Behavioral Health Transformation Extension

Dear Secretary Becerra:

Thank you for the opportunity to provide feedback on the Illinois 1115 Behavioral Health Transformation Extension application.

The undersigned organizations represent millions of individuals facing serious, acute and chronic health conditions. We have a unique perspective on what individuals and families need to prevent disease, cure illness and manage chronic health conditions. The diversity of our organizations and the populations we serve enable us to draw upon a wealth of knowledge and expertise that is an invaluable resource regarding any decisions affecting the Medicaid program and the people that it serves. We urge the Centers for Medicare and Medicaid Services (CMS) to make the best use of the recommendations, knowledge and experience our organizations offer here.

Our organizations are committed to ensuring that Illinois' Medicaid program provides quality and affordable healthcare coverage. Our organizations appreciate the emphasis on health equity in this waiver. We support the inclusion of pre-release services for justice-involved populations and the proposals to address health-related social needs. Our organizations offer the following comments on the Illinois 1115 Behavioral Health Extension application:

Pre-Release Services for Justice-Involved Populations

Our organizations support the proposed community reintegration services for incarcerated individuals up to 90 days prior to release. This is consistent with the goals of Medicaid and will be an important step in improving the continuity of care for individuals. This proposal will help these high-risk populations' access critical supports needed to treat physical and behavioral health conditions. For example, studies in Washington and Florida reported that people with severe mental illness and Medicaid coverage at the time of their release were more likely to access community mental health services and had fewer detentions and stayed out of jail longer than those without coverage.¹ Research has also shown that

cancer mortality is higher among those who are incarcerated or in the first year after incarceration,² further highlighting the necessity of transition services for this population. Our organizations urge you to approve this request.

Health-Related Social Needs

Our organizations appreciate the inclusion of health-related social needs in this waiver. The proposed outreach and engagement program services and the investment in training and certification of community health workers are promising steps towards improving equitable access to quality care in Illinois. The state indicates that the initial rollout of these services may be prioritized by level of need, but if the state is giving priority to certain individuals to receive services earlier than others, CMS should work with Illinois to develop criteria on how 'level of need' will be determined for the rollout. CMS should also ensure that funding for these services is supplementing, not supplanting medical services currently provided under the state plan.

Conclusion

Our organizations support Illinois' efforts to improve equitable access to quality and affordable health coverage. Thank you for the opportunity to provide comments.

Sincerely,

Alpha-1 Foundation
American Lung Association
Arthritis Foundation
Asthma and Allergy Foundation of America
CancerCare
Hemophilia Federation of America
Lutheran Services in America
National Hemophilia Foundation
National Multiple Sclerosis Society
National Patient Advocate Foundation
National Psoriasis Foundation
Pulmonary Hypertension Association
Susan G. Komen
The AIDS Institute
The Leukemia & Lymphoma Society

¹ Joseph Morrissey et al. Medicaid Enrollment and Mental Health Service Use Following Release of Jail Detainees with Severe Mental Illness. *Psychiatric Services* 57, no. 6 (June 2006): 809-815. DOI: 10.1176/ps.2006.57.6.809, and Joseph Morrissey et al. The Role of Medicaid Enrollment and Outpatient Service Use in Jail Recidivism Among Persons with Severe Mental Illness. *Psychiatric Services* 58, no. 6 (June 2007): 794–801. DOI: 10.1176/ps.2007.58.6.794.

² Oladeru OT, Aminawung JA, Lin HJ, Gonsalves L, Puglisi L, et al. (2022) Incarceration status and cancer mortality: A population-based study. *PLOS ONE* 17(9): e0274703. <https://doi.org/10.1371/journal.pone.0274703>