March 20, 2020

Secretary Alex Azar
U.S. Department of Health and Human Services
200 Independence Ave SW
Washington, DC 20201

Re: Renewal Request for the Healthy Indiana Plan (HIP) Section 1115 Waiver

Dear Secretary Azar:

On behalf of the Cancer Support Community (CSC), an international nonprofit organization that provides support, education, and hope to cancer patients, survivors, and their loved ones, we appreciate the opportunity to provide comments on Indiana’s Renewal Request for the Healthy Indiana Plan (HIP) Section 1115 Waiver.

As the largest direct provider of social and emotional support services for people impacted by cancer, and the largest nonprofit employer of psychosocial oncology professionals in the United States, CSC has a unique understanding of the cancer patient experience. Overall, we deliver more than $50 million in free, personalized services each year to individuals and families affected by cancer nationwide and internationally.

CSC is also home to the Research and Training Institute— the only entity of its kind focused solely on the experiences of cancer patients and their loved ones. The Research and Training Institute has contributed to the evidence base regarding the cancer patient experience through its Cancer Experience Registry, various publications and peer-reviewed studies on distress screening, and the psychosocial impact of cancer and cancer survivorship.

Additionally, the CSC Cancer Policy Institute (CPI) brings together patient advocates and policy experts to ensure that the voices of cancer patients and their loved ones play a central role in federal and state legislative, regulatory, and executive policy making. We work in partnership with patient advocates, the CSC affiliate network and RTI, and numerous allied health care and oncology organizations to work towards a future where 15.5 million cancer survivors have access to comprehensive, high-quality, timely, and affordable medical, social, and emotional care.

Cancer patients face a wide variety of barriers in access to quality and comprehensive care. Almost all patients report experiencing barriers in accessing care, regardless of their income-level, location, and health plan. Low-income cancer patients, however, are particularly at risk as they face obstacles in qualifying for, accessing, and maintaining health care coverage for
essential services. Of the nearly 900 patients surveyed in the Access to Care in Cancer 2016 study conducted by CSC, 4.8% had health insurance coverage through Medicaid. Of the patients who reported being uninsured, 43% said they could not afford health insurance, and 31% said they were not eligible for Medicaid. Any additional barriers in access to care for cancer patients will only serve to set back progress and harm cancer patients and their families already facing significant difficulty in securing and maintaining coverage while undergoing difficult, life threatening, and time-consuming treatment regimens.

I. Work Requirements

Federal law does not permit the implementation of work requirements in the Medicaid program, as the core mission of the Medicaid program is to provide comprehensive health coverage to people whose income and resources are “insufficient to meet the costs of necessary medical services.” Section 1115(a) of the Social Security Act was created to allow the Secretary of the Department of Health and Human Services to waive certain provisions of the Medicaid program as long as the initiative is “likely to assist in promoting the objectives of the program.” The Indiana proposal does not fulfil the requirement as it will create significant access barriers for low-income people in the state.

Under the HIP application, individuals between the ages of 19 and 59 are required to prove that they work at least 80 hours per month or meet exemptions. The proposal has failed to address the increased administrative burden on individuals in the Medicaid program. Increasing administrative requirements will likely be a significant burden and cost to Indiana’s existing Medicaid program, as it has the potential to cause serious delays in access to care and create a significant paperwork burden for both enrollees and the state as they work to satisfy the programs requirements. The state of Arkansas implemented a similar community engagement policy that required Medicaid enrollees to report their hours worked or document their exemption. During the first six months of implementation, the state terminated coverage for over 18,000 individuals. Furthermore, a recent study published in The New England Journal of Medicine from a team of Harvard led researchers found that Arkansas’s implementation of the nation’s first work requirements was associated with “significant losses in health insurance coverage in the policy’s initial six months but no significant change in employment.” An inability to navigate these complex administrative changes and a loss of coverage, even temporarily, could have serious, even deadly, consequences for people with cancer. Cancer patients who rely on Medicaid for their life saving treatment cannot afford delays in care due to month’s long administrative processes when attempting to comply, or submitting exceptions requests and appeals for a program that they rely on for their health care.

II. 10 Year Waiver

Indiana is requesting a 10-year extension of its HIP demonstration. The state Section 1115(f)(6) requires that extensions should be for no longer than three years.

III. Conclusion
We appreciate the opportunity to provide comments on the submit comments on Indiana’s Renewal Request for the Healthy Indiana Plan (HIP) Section 1115 Waiver. Access to quality, comprehensive, and affordable healthcare is critically important for Indianans living with cancer, and we strongly continue to support Medicaid expansion in Indiana. However, a program that was designed to provide for the health care needs of low-income individuals without other options should never be provisional based on unattainable goals or detrimental to the health of its citizens. Please reach out to me at efranklin@cancersupportcommunity.org if you would like to discuss any of the above in more detail.

Respectfully Submitted,

Elizabeth Franklin, MSW
Executive Director, Cancer Policy Institute
Cancer Support Community

Eric Richards
President & CEO
Cancer Support Community Central Indiana

References


