



American Association on Health & Disability

110 N. Washington Street Suite 328-J Rockville, MD 20850

T. 301-545-6140 F. 301-545-6144 www.aahd.us

AAHD - Dedicated to better health for people with disabilities through health promotion and wellness



LAKESHORE

March 17, 2017

**Re: Indiana Medicaid Waiver Renewal Application
Healthy Indiana Plan – HIP 2.0 Demonstration
3 Year Extension Application**

The Honorable Thomas Price, M.D.
Secretary, HHS

Submitted:

<https://public.medicaid.gov/connect.ti/public.comments/viewQuestionnaire?qid=1889411>

c.c. Eliot.Fishman@cms.hhs.gov

Dear Secretary Price and CMS Officials:

The American Association on Health and Disability and the Lakeshore Foundation appreciate the opportunity to provide comments.

We associate ourselves with the letter submitted by a coalition of organizations concerned with core consumer/family/patient/enrollee protections as submitted by the Georgetown University, Center for Children and Families and Center for Budget and Policy Priorities.

The American Association on Health and Disability (AAHD) (www.aahd.us) is a national non-profit organization of public health professionals, both practitioners and academics, with a primary concern for persons with disabilities. The AAHD mission is to advance health promotion and wellness initiatives for persons with disabilities.

The Lakeshore Foundation (www.lakeshore.org) mission is to enable people with physical disability and chronic health conditions to lead healthy, active, and independent lifestyles through physical activity, sport, recreation and research. Lakeshore is a U.S. Olympic and Paralympic Training Site; the UAB/Lakeshore Research Collaborative is a world-class research program in physical activity, health promotion and disability linking Lakeshore's programs with the University of Alabama, Birmingham's research expertise.

Specifically, we:

- 1. Oppose Cost Sharing Obligations for Substance Use Disorder Services**
- 2. Concern with Premiums deterring enrollments**
- 3. Oppose Terminating eligibility for non-payment of premium**
- 4. Oppose Non-coverage of non-emergency medical transportation**
- 5. Oppose a 6 month Lock-Out for non-completion of renewal application**
- 6. Oppose Charging tobacco users a surcharge**
- 7. Concern with Implementing high deductible plans in Medicaid**
- 8. Question details of mandatory wellness programs and their compliance with the Americans with Disabilities Act (ADA)**

Thank you for the opportunity to comment. If you have any questions please contact Clarke Ross at clarkross10@comcast.net.

Sincerely,



E. Clarke Ross, D.P.A.

Public Policy Director

American Association on Health and Disability

1718 Reynolds Street

Crofton, MD 21114

clarkross10@comcast.net

410-451-4295

Cell: 301-821-5410

Member, National Quality Forum (NQF) workgroup on persons dually eligible for Medicare and Medicaid (2012-present) and NQF population health task force (2013-2014)

<http://www.qualityforum.org/>) and NQF representative of the Consortium for Citizens with Disabilities (CCD) Task Force on Long Term Services and Supports (<http://www.c-c-d.org/>). 2017 member, NQF MAP workgroup on Medicaid adult measures. 2016-2017 NQF duals workgroup liaison to the NQF clinician workgroup. 2015-2016 and 2014-2015 NQF duals workgroup liaison to the NQF PAC/LTC workgroup. Member, ONC (Office of the National Coordinator for Health Information Technology) Health IT Policy Committee, Consumer Workgroup, March 2013-November 2015; Consumer Task Force, November 2015-April 2016. (<http://www.healthit.gov/policy-researchers-implementers/federal-advisory-committees-facas/consumer-empowerment-workgroup>). Member, SAMHSA Wellness Campaign National Steering Committee – January 2011-September 2014. (<http://promoteacceptance.samhsa.gov/10by10/>).

Roberta S. Carlin, MS, JD

Executive Director
American Association on Health and Disability
110 N. Washington Street, Suite 328J
Rockville, MD 20850
301-545-6140 ext. 206
301 545-6144 (fax)
rcarlin@aahd.us

Amy Rauworth

Director of Policy & Public Affairs
Lakeshore Foundation (www.lakeshore.org)
4000 Ridgeway Drive
Birmingham, Alabama 35209
205.313.7487
amyr@lakeshore.org