



NEW HAMPSHIRE LEGAL ASSISTANCE

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July 12, 2016

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Deborah Fournier, Interim Medicaid Director
New Hampshire Department of Health and Human Services
129 Pleasant Street – Thayer Building
Concord, NH 03301-3857

Via Hand Delivery

RE: New Hampshire Health Protection Program
Premium Assistance Section 1115 Research and Demonstration Waiver
Notice of Amendment to Demonstration Authority

Dear Deb:

New Hampshire Legal Assistance looks forward to reviewing the response of the Department of Health and Human Services (“the Department”) to the following questions regarding the proposed amendment to the Premium Assistance Section 1115 Waiver:¹

1. Does the Department believe a waiver is required to authorize the \$25 copay for second and subsequent non-emergency use of a hospital emergency department?
2. Will the \$8 and \$25 copays for non-emergency use of a hospital emergency department apply to all New Hampshire Health Protection Program (NHHPP) enrollees, regardless of income level?
3. Does the Department believe a waiver is required to permit residency to be considered verified only if the applicant or enrollee provides a New Hampshire driver’s license or non-driver photo identification card?
4. Will NHHPP applicants or enrollees who are not already in compliance with the proposed work requirement be referred to the New Hampshire Employment Program (NHEP) for employment-related services? If not,

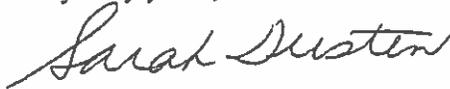
¹ NHLA submits these questions without prejudice to our law firm’s right to submit additional questions and/or comments in advance of the August 1, 2016 public comment deadline, and without prejudice to the right of our law firm and/or our current or future clients to make any claims in any current or future litigation.

will they receive any employment-related services, and who will deliver those services?

5. In addition to those enrollees who are exempt from the work requirement due to temporary illness or incapacity, will those enrollees who have permanent illness or incapacity be exempt?

New Hampshire Legal Assistance expects to file additional comments before the August 1, 2016 deadline. Thank you for your responses to these questions. If you need clarification of any question, please call me at 206-2214.

Very truly yours,

A handwritten signature in cursive script that reads "Sarah Mattson Dustin".

Sarah Mattson Dustin, Esq.
Policy Director



NH Coalition to End Homelessness

A Division of Families in Transition

Deborah Fournier, Deputy Medicaid Director
NH Department of Health and Human Services
129 Pleasant Street
Concord, NH 03301

July 26, 2016

RE: Comments on NH Health Protection Program Premium Assistance Proposed Waiver, project #11-W-00298/1

Ms. Fournier:

Thank you for the opportunity to comment on NH DHHS' NH Health Protection Program Premium Assistance Proposed Waiver, project #11-W-00298. The continuation of the NH Health Protection Program is so essential in ensuring the long term wellbeing of so many of New Hampshire's most vulnerable citizens. Given our experience working with homeless service providers across the state, we are writing to express our opposition to the proposal to enhance requirements regarding citizenship verification.

The NH Coalition to End Homelessness is quite concerned that the proposed requirements would create a significant burden on NH's homeless population. People who are experiencing homelessness very often struggle to get access to needed services because they lack a form of identification. Given the many challenges that they face, which often include chronic physical and mental health disorders, it often takes weeks or even months for individuals to acquire even one form of identification. Requiring two forms of identification will undoubtedly reduce their ability to access Medicaid coverage, thereby further hindering their access to needed care.

As has been shown in many studies across the country, without access to housing and supportive services, those with the greatest needs are often forced to rely on expensive emergency services which come at a significant cost to the community. Research shows that access to health care in addition to supportive housing services can reduce public costs while at the same time improving health and wellness outcomes for those most vulnerable. Requiring extra citizenship verification requirements will create additional barriers to care, making it even harder for our most vulnerable citizens to achieve long term stability and wellness. In light of this, I hope that you will consider modifying the verification requirements to ease entry for those who face barriers in accessing proof of citizenship documentation.

Sincerely,

Cathy Kuhn, PhD



NASHUA SOUP KITCHEN & SHELTER, INC.

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July 26, 2016

Deborah Fournier, Deputy Medicaid Director
NH Department of Health and Human Services
129 Pleasant Street
Concord, NH 03301

Dear Ms. Fournier,

RE: Comments on NH Health Protection Program Premium Assistance Proposed Waiver, project #11-W-00298/1

Thank you for the opportunity to comment on NH DHHS' NH Health Protection Program Premium Assistance Proposed Waiver, project #11-W-00298. The continuation of the NH Health Protection Program is critical to the clients served by the Nashua Soup Kitchen & Shelter and all of the shelter providers in the state.

The Nashua Soup Kitchen and Shelter, Inc. is a private nonprofit serving homeless and low income individuals and families with children in the Greater Nashua area. We operate a soup kitchen, food pantry, two emergency homeless shelters, transitional housing, an Employment and Education program, and provide other various services. **I would like to share our opposition to the proposed enhanced requirements regarding citizenship verification.**

I would estimate the vast majority of folks coming to homeless shelters do not have any ID. They have lost it along the way and it is time consuming and expensive to help them obtain even one ID. Requiring two would create a significant burden on NH's homeless population and the agencies that serve them. That requirement would compromise their ability to access Medicaid coverage and create an undue burden to access the NH Health Protection Program. **We urge you to modify the citizenship verification requirements to ease entry for those with no access to proof of citizenship.**

Sincerely,

Lisa Christie
Executive Director



Deborah Fournier, Deputy Medicaid Director
NH Department of Health and Human Services
129 Pleasant Street
Concord, NH 03301

July 26, 2016

RE: Comments on NH Health Protection Program Premium Assistance Proposed Waiver, project #11-W-00298/1

Ms. Fournier:

Thank you for the opportunity to comment on NH DHHS' NH Health Protection Program Premium Assistance Proposed Waiver, project #11-W-00298. The continuation of the NH Health Protection Program is important to Housing Action NH and its member organizations. We would like to share our opposition to the proposed enhanced requirements regarding citizenship verification.

Citizenship Verification

Although we appreciate the intent to ensure compliance with Medicaid eligibility, the proposed requirements in the waiver would create a significant burden on NH's homeless population. Individuals and families experiencing homelessness are some of the most vulnerable people in our state. NH's homeless often have very little income and significant health challenges, including severe mental illness and substance use disorders. Given their inherent day-to-day instability it is often challenging for them to secure one form of identification. Requiring two forms of identification will certainly challenge their ability to access Medicaid coverage and thus create an undue burden to access the NH Health Protection Program.

The stress of instability and/or living in places unfit for human habitation can exacerbate health challenges and generate high public costs through law enforcement and uncompensated health care delivery. Since the launch of the NH Health Protection Program, we know that almost 4,300 people who have used NH's homeless shelter system¹ have been successfully enrolled in Medicaid. Access to health care in addition to supportive housing services² can transition the homeless to secure living environments and significantly improve health outcomes and decrease public costs. We urge you to modify the citizenship verification requirements to ease entry for those with no access to proof of citizenship.

Thank you for your consideration.

Sincerely,

Elissa Margolin, Director
Housing Action NH
603.828.5916

About Housing Action NH: Housing Action NH is a diverse coalition of 80 organizations and businesses that advocate for state and federal policies and investments that preserve and increase the supply of affordable housing and help end homelessness in New Hampshire.



Greater Seacoast Coalition to End Homelessness

July 27, 2016

Deborah Fournier, Deputy Medicaid Director
NH Department of Health and Human Services
129 Pleasant Street
Concord, NH 03301

RE: Comments on NH Health Protection Program Premium Assistance Proposed Waiver, project #11-W-00298/1

Ms. Fournier,

Thank you for the opportunity to comment on NH DHHS' NH Health Protection Program Premium Assistance Proposed Waiver, project #11-W-00298. The continuation of the NH Health Protection Program is important to the Greater Seacoast Coalition to End Homelessness (GSCH) and the many organizations with whom it works. To that end, we would like to share our opposition to the proposed enhanced requirements regarding citizenship verification.

Citizenship Verification

While we support the intent to ensure compliance with Medicaid eligibility, the proposed requirements in the waiver would create a significant burden on those experiencing or at risk of homelessness in New Hampshire. As you well know, individuals and families experiencing homelessness are some of the most vulnerable people in our state. NH's homeless often have very little income and significant health challenges, including severe mental illness and substance use disorders. Many are challenged to secure even one form of identification given the inherent instability of their daily life, which means the challenge of accessing Medicaid coverage already exists for some. Requiring two forms of identification will certainly make it more difficult to access Medicaid coverage and create an undue burden to access the NH Health Protection Program.

GSCH's Community Care Teams see firsthand the impact that homelessness has on exacerbated health issues and the high public costs of uncompensated health care delivery, particularly through improper use of emergency services. We also see the positive impact that access to health care and supportive housing services can have in significantly improving health outcomes.

Access to health care in addition to supportive housing services can transition the homeless to secure living environments, significantly improve health outcomes and decrease public costs. We urge you to modify the citizenship verification requirements to ease entry for those with no access to proof of citizenship.

Sincerely


Maria Sillari, Director

Greater Seacoast Coalition to End Homelessness
603-305-0422

C/O FAMILIES FIRST HEALTH AND SUPPORT CENTER
100 CAMPUS DRIVE • PORTSMOUTH, NH • 03801
PHONE: 603.305.0422 • E-MAIL: MSILLARI14@GMAIL.COM

Deborah Fournier, Deputy Medicaid Director
NH Department of Health and Human Services
129 Pleasant Street
Concord, NH 03301

July 26, 2016

Re: Comments on NH Health Protection Program Premium Assistance Proposed Waiver, project #11-W-00298/1

Dear Ms. Fournier:

I am writing you in regards to the NH DHHS' NH Health Protection Program Premium Assistance Proposed Waiver, project #11-W-00298. The continuation of the NH Health Protection Program is a vital resource to a number of individuals and families within the state. As a provider of housing assistance and being employed at a community mental health center working with the homeless, I have extensive experience assisting individuals to access this important resource. I would like to share my concerns to the proposed enhanced requirements regarding citizenship verification.

Citizenship Verification

The proposed requirements for Medicaid eligibility in the waiver would create a significant burden on NH's homeless population. Individuals and families experiencing homelessness are some of the most vulnerable people in our state. NH's homeless often have very little income and significant health challenges, including severe mental illness and substance use disorders. Given their inherent day-to-day instability it is often challenging for them to secure one form of identification. Requiring two forms of identification will certainly challenge their ability to access Medicaid coverage and thus create an undue burden to access the NH Health Protection Program.

The stress of instability and/or living in places unfit for human habitation can exacerbate health challenges and generate high public costs through law enforcement and uncompensated health care delivery. Due to the NH Health Protection Program, my staff and I have been able to assist a significant number of homeless individuals in accessing mental health and/or substance abuse services. Access to health care in addition to supportive housing services can transition the homeless to secure living environments and significantly improve health outcomes and decrease public costs. I urge you to modify the citizenship verification requirements to ease entry for those with no access to proof of citizenship.

Thank you for your consideration.

Sincerely,



Barry Quimby-Housing Director
Center for Life Management



Southwestern Community Services

Since 1965, people helping people in Cheshire and Sullivan counties

August 1, 2016

Deborah Fournier, Deputy Medicaid Director
NH Department of Health and Human Services
129 Pleasant St.
Concord, NH 03301

RE: NH Health Protection Program Premium Assistance Proposed Waiver, project #11-W-00298/1

Ms. Fournier:

Thank you for the opportunity to comment on NH DHHS' NH Health Protection Program Premium Assistance Proposed Waiver, project #11-W-00298. The continuation of the NH Health Protection Program is important to Southwestern Community Services. We would like to share our opposition to the proposed enhanced requirements regarding citizenship verification.

Citizenship Verification

Although we appreciate the intent to ensure compliance with Medicaid eligibility, the proposed requirements in the waiver would create a significant burden on NH's homeless population. Individuals and families experiencing homelessness are some of the most vulnerable people in our state. Given their inherent day-to-day instability it is often challenging for them to secure one form of identification. Requiring two forms of identification will certainly challenge their ability to access Medicaid coverage and thus create an undue burden to access the NH Health Protection Program.

Access to health care in addition to supportive housing services can help with the transition of homeless individuals and households to secure living environments and significantly improve health outcomes and decrease public costs. We urge you to modify the citizenship verification requirements to ease entry for those with no access to proof of citizenship.

Sincerely,

Keith F. Thibault, chief development officer
Southwestern Community Services

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Phone: (603) 352-7312
Fax: (603) 352-3618



United Way

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