

Mondragon, Tabitha, HSD

From: Julianna Koob <juliannakoob@gmail.com>
Sent: Thursday, October 25, 2018 9:06 PM
To: HSD-madrules
Subject: [EXT] public comments for the 1115 waiver

To whom it may concern: Planned Parenthood of New Mexico (PPNM) submits the following comments in response to the 1115 waiver:

1. To the extent that this revision is not mandated by federal law or by the New Mexico Medicaid Plan, PPNM objects to removing "continuous eligibility".
2. PPNM appreciates HSD increasing the proposed age cap for family planning from 45 to 51 years old, but still has concerns about putting an age limit on family planning due to the need for comprehensive family planning services beyond age 51 for all people, including men and women. New Mexico has seen an increase in STIs in our older adult population, which is just one example of why we should not impose an age cap on recipients.
3. PPNM has concerns about the proposed language to drop family planning coverage for people who have other forms of insurance since other forms of insurance are not as comprehensive as Medicaid in their FP coverage. While PPNM appreciates excluding Medicare from this provision, we still have concerns about comprehensive coverage under other forms of insurance.
4. PPNM applauds HSD's proposed changes to provide 60 Day postpartum LARC. This is very important expansion of services for women who receive Medicaid pregnancy or pregnancy-related services.
5. **Putting the burden of premiums or co-pays on recipients:** HSD should not move forward with imposing premiums or co-pays. Numerous studies from other states have shown that even "nominal" premiums in Medicaid have resulted in thousands of individuals losing their coverage. If we are understanding the proposed rule changes, in 2019, adults making between 100-138% of the FPL (between \$2092-2887/month for a four-person household) will have to pay \$10/month. If an adult is unable to make payments for three months, they will be locked out from Medicaid for three additional months and only allowed back into the coverage if they can make the premium back-payments. This change would result in people losing health care. PPNM objects to this proposed change.
6. It is unclear in this proposal where retroactive coverage will be removed, but PPNM opposes any removal of retroactive coverage because this removal will put families at risk of crushing medical debt and leave hospitals and other providers with more uncompensated care costs.

Planned Parenthood of New Mexico

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