



STATE OF MICHIGAN

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GOVERNOR

DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

ROBERT GORDON
DIRECTOR

February 8, 2019

The Honorable Seema Verma
Administrator
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Dear Administrator Verma:

This letter supplements the State of Michigan's formal acceptance of the Healthy Michigan Plan's Special Terms and Conditions (STCs), as provided in your December 21, 2018 correspondence. Over the last several years of the Healthy Michigan Plan, Michigan has worked with CMS to address certain technical corrections to the STCs as part of the demonstration approval process and is taking this opportunity to do so again. We look forward to discussing these items with your team as we work to implement the next phase of the Healthy Michigan Plan.

Preserving Approved Protocols

The proposed STCs eliminate Michigan's current protocols for both the Healthy Behaviors program and the MI Health Account. These protocols, which were previously approved by CMS and expressly incorporated into the Healthy Michigan Plan demonstration, provide important operational details for these unique program components. Moreover, these program components will remain in place for most Healthy Michigan Plan members.

Given that CMS is continuing to utilize the protocol format for state reporting purposes (*see* STC #46), Michigan would prefer to maintain the MI Health Account and Healthy Behavior protocols, with any necessary updates, as part of the overall demonstration package.

Healthy Behavior Program Flexibility

Michigan appreciates the push toward greater state flexibility in demonstrations. In that spirit, Michigan requests that STC #24 and STC#27 be amended to incorporate additional healthy behaviors outside of the codes listed in Attachment E, such as wellness programs or other healthy activities, and that the state be allowed both to communicate this range of options to beneficiaries more generally and expand any approved Healthy Behaviors in the future without the need for a formal waiver amendment.


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Other Technical Edits

Michigan looks forward to sharing its suggested technical changes on or before an upcoming monitoring call with CMS staff, and believes this approach is the most efficient way to address any editorial fixes as well as minor revisions to better reflect Michigan's unique program objectives.

Thank you again for the assistance you and your team have already provided. We look forward to continued collaboration as we work with CMS in support of the Healthy Michigan Plan.

Sincerely,



Kathy Stiffler, Acting Director
Medical Services Administration
Michigan Department of Health and Human Services