



October 15, 2021

The Honorable Xavier Becerra
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Re: Montana's Medicaid Section 1115 Demonstration

Dear Secretary Becerra,

The American Cancer Society Cancer Action Network (ACS CAN) appreciates the opportunity to comment on the Montana Department of Public Health and Human Services' Section 1115 Demonstration Amendment Application. ACS CAN is making cancer a top priority for public officials and candidates at the federal, state, and local levels. ACS CAN empowers advocates across the country to make their voices heard and influence evidence-based public policy change, as well as legislative and regulatory solutions that will reduce the cancer burden. As the American Cancer Society's nonprofit, nonpartisan advocacy affiliate, ACS CAN is critical to the fight for a world without cancer.

ACS CAN opposes the proposed elimination of continuous eligibility for adults enrolled in the Medicaid program proposed in the amendment. Nearly 7,000 Montanans are expected to be diagnosed with cancer in 2021¹ and there are nearly 60,000 cancer survivors in the state² – many of whom are receiving health care coverage through the Medicaid program.

Montana's expanded eligibility for Medicaid has allowed nearly 100,000 adults across the state to gain health insurance coverage – and with that, access to cancer screenings and prevention, early detection, treatment, and care throughout survivorship. The waiver application notes 12,071 adults have received a colon cancer screening with 4,466 potential cases of colon cancer averted, and 14,077 women have received a breast cancer screening.³ Eliminating continuous eligibility will threaten these significant gains and reduce the number of eligible individuals who have the tools and access needed to prevent or detect cancer early when it is less costly to treat and the prognosis better.

We strongly urge your Department to reject this waiver amendment.

¹ American Cancer Society. *Cancer Facts & Figures 2021*. Atlanta, GA: American Cancer Society; 2021.

² American Cancer Society. *Cancer Treatment & Survivorship Facts & Figures 2019-2021*. Atlanta, GA: American Cancer Society; 2019.

³ Montana Healthcare Foundation, 2019 Report on Health Coverage and Montana's Uninsured, June 2019, available at

<https://mthcf.org/resources/2019-report-on-health-coverage-and-montanans-uninsured/>.

Continuous Eligibility Protects Cancer Patients

ACS CAN wants to ensure that cancer patients and survivors in Montana will have coverage under the Medicaid program, and that program requirements do not create barriers to care for low-income cancer patients, survivors, and those who will be diagnosed with cancer. Eliminating continuous eligibility will create additional barriers and requirements for enrollees, likely reducing the number of Montanans who can access essential health care, including cancer prevention and treatment. Terminating individuals' eligibility could place a substantial financial burden on enrollees and cause significant disruptions in care, particularly for individuals in active cancer treatment.

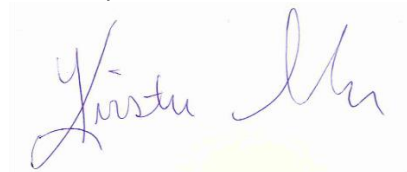
When individuals lose coverage due to small – often temporary – fluctuations in income, it could result in loss of access to health care coverage, making it difficult or impossible for those with cancer to continue treatment. For cancer patients who are mid-treatment, a loss of health care coverage could seriously jeopardize their chance of survival. The loss of coverage can be devastating to cancer patients and their families.

Conclusion

We appreciate the opportunity to provide comments on the waiver amendment. The preservation of eligibility and coverage through the Medicaid program remains critically important for many low-income Montanans who depend on the program for cancer and chronic disease prevention, early detection, diagnostic, and treatment services. We ask the Department to reject this waiver amendment.

Maintaining access to quality, affordable, accessible, and comprehensive health care coverage and services is a matter of life and survivorship for thousands of low-income cancer patients and survivors, and we look forward to working with your Department to ensure that all people are positioned to win the fight against cancer. If you have any questions, please feel free to contact my staff at Jennifer.Hoque@cancer.org.

Sincerely,

A handwritten signature in blue ink that reads "Kirsten Sloan". The signature is written in a cursive style and is positioned above a yellow rectangular highlight.

Kirsten Sloan
Managing Director, Public Policy
American Cancer Society Cancer Action Network