



June 2, 2023

Stephanie McGee Azar
Commissioner
Alabama Medicaid Agency
501 Dexter Avenue, P.O. Box 524
Montgomery, AL 36103

Re: Alabama 1115 Substance Use Disorder Demonstration Proposal

Dear Commissioner Azar:

The undersigned organizations represent millions of individuals facing serious, acute and chronic health conditions in Alabama. We appreciate the state's interest in extending access to care for substance use disorders through this Section 1115 Substance Use Disorder Demonstration Proposal. To further expand access to treatment for substance use disorders and other health conditions, we urge the state to fully expand Medicaid to 138% of the federal poverty level for all Alabama residents.

Fully expanding Medicaid would allow Alabamans, including those with substance use disorders (SUDs) who haven't been formally diagnosed and those without SUDs to access potentially life-saving essential care and preventive services. Studies consistently show that Medicaid expansion is associated with higher SUD treatment rates, as well as increased availability of SUD treatment.¹²³ For example, when Kentucky expanded Medicaid, more than 300 new behavioral health providers were enrolled and over 13,000 Kentuckians were able to receive treatment in the first year through Medicaid expansion.⁴ Access to these treatments can change people's lives. In the 2018 Ohio Medicaid Group VIII Assessment,⁵ the following was highlighted:

Obtaining behavioral health care made a significant difference in the lives of many enrollees with substance use disorder. In the words of one respondent: "[Medicaid] means a lot, it means I can get help with my addiction, gets me the counseling I need. If I didn't have it I would probably end up back in jail."

Medicaid expansion helps people with substance abuse disorders get the treatment they need.

Alabama's proposal to extend Medicaid eligibility to certain uninsured adults with SUDs is limited to certain counties within Alabama and only those with diagnosed SUDs. Many otherwise eligible Alabamans may live in a different county or have an SUD that has gone undiagnosed. An analysis of the National Survey of Substance Use and Health found that SUD prevalence in the Medicaid population is higher than Medicaid claims data, particularly among young adults.⁶ We urge the state to expand Medicaid coverage to all adult low-income Alabamans to ensure improved health outcomes for SUD patients and all other patients in the state, where 219,000 adults stand to gain coverage if Medicaid were to expand to 138% of the federal poverty level for all adults.⁷

Medicaid expansion is associated with a reduction in preventable hospitalizations⁸ as well as a significant decrease in overall mortality.⁹ Additionally, Medicaid expansion has helped state economies and has been associated with a reduced risk of hospital closures, especially in rural areas.¹⁰ Our organizations believe that expansion of the Medicaid program to 138% of the federal poverty level is an important step in advancing quality and affordable health care in Alabama, and is the best way for the state to achieve its goals in this proposal.

Thank you for the opportunity to provide comments.

Sincerely,

Alabama Arise
Alabama Disabilities Advocacy Program
American Cancer Society Cancer Action Network
American Heart Association
American Lung Association
Epilepsy Foundation
Hemophilia Federation of America
National Multiple Sclerosis Society
National Patient Advocate Foundation
The AIDS Institute
The Leukemia & Lymphoma Society

¹ Cher, Benjamin A.Y. MS*, †; Morden, Nancy E. MD, MPH*; Meara, Ellen PhD*, ‡. Medicaid Expansion and Prescription Trends: Opioids, Addiction Therapies, and Other Drugs. *Medical Care* 57(3):p 208-212, March 2019. | DOI: 10.1097/MLR.0000000000001054

² Angélica Meinhofer, Allison E. Witman, The role of health insurance on treatment for opioid use disorders: Evidence from the Affordable Care Act Medicaid expansion, *Journal of Health Economics*, Volume 60, 2018, Pages 177-197, ISSN 0167-6296, Available at: <https://doi.org/10.1016/j.jhealeco.2018.06.004>.<https://www.sciencedirect.com/science/article/abs/pii/S0167629617311530>.

³ Saloner B, Levin J, Chang H, Jones C, Alexander GC. Changes in Buprenorphine-Naloxone and Opioid Pain Reliever Prescriptions After the Affordable Care Act Medicaid Expansion. *JAMA Netw Open*. 2018;1(4):e181588. doi:10.1001/jamanetworkopen.2018.1588

⁴ Commonwealth of Kentucky, Medicaid Expansion Report 2014. Deloitte Development, LLC, 2015. Available at: https://jointhehealthjourney.com/images/uploads/channel-files/Kentucky_Medicaid_Expansion_One-Year_Study_FINAL.pdf

⁵ 2018 Ohio Medicaid Group VIII Assessment. August 2018. Accessed at:

<https://medicaid.ohio.gov/static/Resources/Reports/Annual/Group-VIII-Final-Report.pdf>

⁶ Saunders, Heather. “A Look at Substance Use Disorders Among Medicaid Enrollees.” Kaiser Family Foundation. February 17, 2023. Available at: <https://www.kff.org/medicaid/issue-brief/a-look-at-substance-use-disorders-sud-among-medicaid-enrollees/>

⁷ Rudowitz, Robin et al. “How Many Uninsured are in the Coverage Gap and How Many Could Be Eligible if All States Adopted the Medicaid Expansion?” Kaiser Family Foundation. March 31, 2023. Available at: <https://www.kff.org/medicaid/issue-brief/how-many-uninsured-are-in-the-coverage-gap-and-how-many-could-be-eligible-if-all-states-adopted-the-medicaid-expansion/>

⁸ Hefei Wen Kenton J. Johnston, Lindsay Allen, and Theresa M Waters. “Medicaid Expansion Associated with Reductions in Preventable Hospitalizations.” November 2019. *Health Affairs*. Doi 10.1377/hlthaff.2019.00483.

⁹ Guth, Madeline, and Ammula, Meghana. “Building on the Evidence Base: Studies on the Effects of Medicaid Expansion, February 2020 to March 2021.” Kaiser Family Foundation, May 6, 2021. Available at: <https://www.kff.org/report-section/building-on-the-evidence-base-studies-on-the-effects-of-medicaid-expansion-february-2020-to-march-2021-report/#Mortality>.

¹⁰ Richard Lindrooth, Marcelo Perrailon, Rose Hardy, and Gregory Tung, “Understanding the Relationship Between Medicaid Expansions and Hospital Closures,” *Health Affairs* 27, no. 1 (January 2018): pp. 111-120. Available at <https://www.healthaffairs.org/doi/abs/10.1377/hlthaff.2017.0976>.