



January 29, 2025

The Honorable Dorothy Fink
Acting Secretary
U.S. Department of Health and Human Services
200 Independence Ave, SW
Washington, DC 20201

Re: Nevada 1115 Reentry Demonstration

Dear Acting Secretary Fink:

Thank you for the opportunity to submit comments on Nevada's 1115 Reentry Demonstration.

The undersigned organizations represent millions of individuals facing serious, acute and chronic health conditions. We have a unique perspective on what individuals and families need to prevent disease, cure illness and manage chronic health conditions. The diversity of our organizations and the populations we serve enable us to draw upon a wealth of knowledge and expertise that is an invaluable resource regarding any decisions affecting the Medicaid program and the people that it serves. We urge the Centers for Medicare and Medicaid Services (CMS) to make the best use of the recommendations, knowledge and experience our organizations offer here.

Our organizations are committed to ensuring that Nevada's Medicaid program provides quality and affordable healthcare coverage. We applaud the state's work to improve access to care in this waiver and support the proposal to provide transitional services for justice-involved individuals otherwise eligible for Medicaid or CHIP. Our organizations urge CMS to approve this proposal and offer the following comments on the Nevada's 1115 Reentry Demonstration:

Our organizations support Nevada's proposal to provide a targeted set of Medicaid services for justice-involved populations who are otherwise eligible for Medicaid for up to 90 days prior to release. This is consistent with both the goals of Medicaid and CMS guidance and will be an important step in improving the continuity of care. This proposal will help these high-risk populations access critical supports needed to treat physical and behavioral health conditions. For example, studies in Washington and Florida

reported that people with severe mental illness and Medicaid coverage at the time of their release were more likely to access community mental health services and had fewer detentions and stayed out of jail longer than those without coverage.¹ CMS should work with the state to ensure that existing state spending on healthcare for this population is supplemented, not replaced when implementing this policy.

Nevada's proposed tiered system to service implementation is a strategic approach to ensuring access to services across participating facilities. This model establishes a baseline tier of services, including case management and a 30-day medication supply, while introducing additional services. CMS should ensure that clear criteria are established for assessing facility readiness to provide additional service tiers. CMS should also ensure that the additional services are meaningful improvements over the standard facility services, not replacing services already available.

Our organizations further urge CMS to work with the state to ensure that its evaluation includes measures that track disparities and service-specific impacts. While Nevada's evaluation includes important metrics around health outcomes and service utilization, it would be strengthened by including more detailed health outcomes for specific populations.

Our organizations support Nevada's proposal to implement pre-release services for the justice-involved population and we urge CMS to approve this demonstration. Thank you for the opportunity to provide comments.

Sincerely,

AiArthritis

American Cancer Society Cancer Action Network

American Diabetes Association

American Lung Association

CancerCare

Epilepsy Foundation America

National Kidney Foundation

National Patient Advocate Foundation

National Psoriasis Foundation

Pulmonary Hypertension Association

Susan G. Komen

The AIDS Institute

The Leukemia & Lymphoma Society

WomenHeart

¹Joseph Morrissey et al. Medicaid Enrollment and Mental Health Service Use Following Release of Jail Detainees with Severe Mental Illness. *Psychiatric Services* 57, no. 6 (June 2006): 809-815. DOI: 10.1176/ps.2006.57.6.809, and Joseph Morrissey et al. The Role of Medicaid Enrollment and Outpatient Service Use in Jail Recidivism Among Persons with Severe Mental Illness. *Psychiatric Services* 58, no. 6 (June 2007): 794-801. DOI: 10.1176/ps.2007.58.6.794.