

December 14, 2016

Eliot Fishman  
Director  
Center for Medicaid and CHIP Services  
Centers for Medicare & Medicaid Services  
U.S. Department of Health and Human Services  
7500 Security Blvd, Mail Stop S2-01-16  
Baltimore, MD 21244-1850

Re: Support for New York Partnership Plan Waiver Amendment

Dear Mr. Fishman:

On behalf of the American Medical Association (AMA), the Medical Society of the State of New York (MSSNY), and our physician and medical student members, we urge the Centers for Medicare & Medicaid Services (CMS) to approve the recently submitted amendment to New York's section 1115 demonstration waiver, the New York Partnership Plan, which would authorize federal Medicaid matching funds for certain Medicaid services provided within 30-days prior to the release of incarcerated Medicaid enrollees.

Research has demonstrated that individuals released from incarceration often experience significant barriers to successful community re-entry. For the Medicaid enrollees who would be eligible for services under the submitted waiver—i.e., individuals with two or more chronic physical or behavioral conditions, serious mental illness, or HIV/AIDS—community re-entry presents additional challenges. In correctional facilities, individuals have access to consistent care, but they may re-enter the community with a limited supply of medication and without a means to obtain medical services in the community. For individuals with complex needs, serious mental illness or substance use disorders, the disruption in care can have dire consequences, leading to relapse, overdose, and recidivism. Continuity of care is vital for these particularly at-risk individuals.

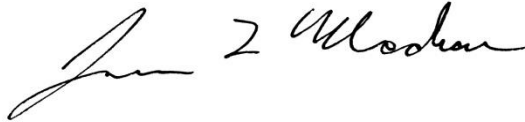
The amendment to New York's Partnership Plan seeks to address these challenges. The initiative would connect incarcerated individuals with care managers to develop integrated care plans that identify the medical and social supports needed for successful transition. The initiative would also facilitate enrollment in health care programs for which individuals are eligible at the time of release and establish relationships with health care providers prior to discharge in order to ensure continuity of care.

Importantly, the waiver would also provide access to certain stabilizing medications that help ensure longer-term medical and psychiatric stability post-release.

We applaud the New York State Department of Health for seeking to address many of the challenges associated with community re-entry and urge CMS to approve the waiver proposal. These efforts to bridge the gap in connectivity to health care for incarcerated individuals will help establish coverage effective upon release, assist with transition to care in the community, and help reduce recidivism.

The AMA and MSSNY thank you for your consideration of this important issue. If you have any questions, please contact Margaret Garikes, Vice President of Federal Affairs, at [margaret.garikes@ama-assn.org](mailto:margaret.garikes@ama-assn.org) or 202-789-7409, or Moe Auster, Senior Vice President of Governmental Affairs, at [mauster@mssny.org](mailto:mauster@mssny.org) or 518-465-8085.

Sincerely,



James L. Madara, MD  
Executive Vice President, CEO  
American Medical Association



Malcolm D. Reid, MD, MPP  
President  
Medical Society of the State of New York