

May 6, 2021

***Submitted via email***

Dear Chair Benson, Chair Liebling and Members of the Health and Human Services Conference Committee,

On behalf of Allina Health, thank you for your ongoing efforts to pass meaningful legislative proposals that will better the lives of Minnesotans. As the health and human services conference committee deliberates numerous proposals, we urge you to support the following:

- **Eliminating maternal health disparities.** We know providing culturally responsive care as well as addressing implicit bias is critical to providing truly equitable care, which is why Allina Health has already started implicit bias training for all of our care givers. Please support maternal health implicit bias training, increased access to midwife and doula services, more detailed mortality data reporting and extending Medical Assistance postpartum coverage from 60 days to 1 year.
- **Telehealth reform.** Allina Health is serving over 1 million patients annually and with the expansion of telehealth services under state and federal waivers, we have reduced readmissions by increasing access for post hospitalization treatment through virtual care; improved chronic disease management with increased convenience of care; and decreased no-show/cancellation rates in mental health services due to transportation, weather, or needing to take time off work. We support “originating site” being redefined to where the patient is located; eliminating the “three visits per week” limitation for Medicaid patients, as well as allowing Licensed Alcohol and Drug Counselors and other mental health professionals to continue to provide and be reimbursed for telehealth services; continuing coverage for phone-only mental health and addiction appointments after an initial face-to-face appointment, as well as verbal consent on individual treatment plans.

Additionally, we support providing flexibility to use the most effective care delivery methods available to manage and treat chronic or acute conditions, as well as ensuring sustainable payment for delivery of telehealth services without restricting innovation, such as value-based care payment models.

- **Access to mental health and substance use disorder (SUD) services.** Please support allowing HCBS waivers to stay open for 121 days while a person is receiving inpatient care. This proposal ensures access to continuous services when someone leaves inpatient care, reducing delays in discharge and preventing some readmissions to the hospital setting. In addition, please support workforce and professional cultural competency provisions, timely provider credentialing by health plan companies, SUD paperwork reduction, extending the 1115 waiver another five years and streamlining the intensive residential treatment services (IRTS) process by repealing the county assessment of need and instead requiring notification to county and allowing the county to submit a statement of support or opposition.
- **Background check reform.** We support streamlining care provider background checks to eliminate duplication. We also support allowing health care professionals 180 days or more after the peacetime emergency ends to complete their background checks to renew their license. The onset of the pandemic, the need to hire more health care staff and fingerprinting locations closing presented significant barriers in submitting fingerprints as part of the background check process.
- **Emergency shelters funding and extending housing support absences.** Shelters have been working tirelessly since before the pandemic to respond to our state’s housing and homelessness crisis, and the

need for their services will continue. Please include extending Housing Support absences for individuals seeking health care treatment. Housing Support recipients are currently limited to 18-day absences before losing their housing benefit. For those requiring hospitalization for chronic medical conditions or longer-term substance use disorder or mental health treatment, this forces them to choose between their home and their health.

We respectfully do not support the following provisions as drafted and request they be removed to allow for additional work on the problems these proposals are trying to solve:

- **Nonemergency medical transportation (NEMT) changes.** The proposal requires Department of Human Services (DHS) to contract for the administration of NEMT services and repeals the prohibition on using a broker or coordinator. As in the past, Allina Health remains opposed to involving a new third-party entity administer. There are concerns about the impacts to payments for services as well as access to services, especially for those patients needing same day, evening or weekend transportation.
- **Waiver growth limits.** The senate disability services proposal limits waiver growth, which may re-create waiting lists for waived services, preventing people living with disabilities from getting the care they need. We encourage the committee to look at other cost saving measures within waived services that will not delay needed care.
- **State initiatives impacting the federal 340B Drug Pricing Program.** This includes the Medical Assistance (MA) pharmacy benefit carve-out as well as reporting provisions. Transferring the administration and delivery of the MA managed care pharmacy benefit to DHS negatively impacts hospitals participating in the Federal 340B Drug Pricing Program. This provision triggers federal regulation that will eliminate a sizeable portion of savings generated through the 340B program. Allina Health has 8 hospitals enrolled in the 340B program, 6 of which qualify due to their disproportionate share hospital (DSH) status. DSH hospitals provide care to a higher number of low income and uninsured patients and Medicaid enrollees. The savings from these discounts allow hospitals to provide an expanded range of health services to vulnerable patients and communities. We suggest looking at the national good stewardship principles established by the American Hospital Association and adopted by local providers, including Allina Health.

Thank you for the opportunity to provide comments on the health and human services proposals and for your consideration of these requests.

Sincerely,



Kristen McHenry  
Director, Government Relations  
Allina Health