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*Executive Director*

March 21, 2019

The Honorable Alex M. Azar II  
Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Secretary Azar:

Section 1015 of the SUPPORT for Patients and Communities Act (the SUPPORT Act, P.L. 115-271) requires the Secretary of the U.S. Department of Health and Human Services (HHS) to publish a report with comprehensive data on the prevalence of substance use disorders in the Medicaid population and the services provided under Medicaid for the treatment of such disorders. Among other data, the report must include the number and percentage of individuals in each of the major Medicaid enrollment categories who have been diagnosed with a substance use disorder and whether those individuals are enrolled under the Medicaid state plan or a waiver.

Section 1015(a)(2)(A) of the SUPPORT Act charges the Medicaid and CHIP Payment and Access Commission (MACPAC) with defining in a public letter the major Medicaid enrollment categories for purposes of this report. Accordingly, we recommend that HHS use the following eligibility groups in the report:

- children age 0–18, excluding those eligible on the basis of a disability;
- adults eligible under Section 1902(a)(10)(A)(i)(VIII) of the Social Security Act as added in the Patient Protection and Affordable Care Act (P.L. 111-148, as amended);
- other adults age 19–64, such as parents and other caretaker relatives, excluding those eligible on the basis of a disability;
- individuals over age 65;
- adults age 19–64 who are eligible on the basis of a disability;
- children age 0–18 who are eligible on the basis of a disability;
- pregnant women; and,
- individuals dually eligible for Medicaid and Medicare who receive full Medicaid benefits.



If data are available, MACPAC also suggests including a number of special populations that may be particularly affected by the opioid epidemic. For example, children who qualify for Medicaid on the basis of child welfare assistance generally have a high prevalence of behavioral health conditions (MACPAC 2015). Similarly, full-benefit dually eligible beneficiaries under age 65 experience higher rates of behavioral health conditions than such beneficiaries over age 65 (MACPAC and MedPAC 2018). Older adolescents represent an additional category for consideration, as buprenorphine may be prescribed to patients age 16 and older with opioid use disorders. Finally, federal guidance issued in 2018 noted the critical role played by Medicaid in the care of infants with neonatal abstinence syndrome. Although not characterized as a substance use disorder, neonatal abstinence syndrome results from exposure to opioids and affects thousands of infants whose care is paid for by Medicaid (CMS 2018).

We recognize that T-MSIS data are still being validated and there may be gaps in the data available at this time, making it challenging to report on all of the eligibility categories we recommend. Even so, we encourage HHS to report on these eligibility categories in its inaugural data book, note instances where data are incomplete, and build the content of subsequent editions as data improvements are made.

If you have any questions or would like to discuss our recommendations, please feel free to contact me or have your staff contact Anne Schwartz, executive director, at 202-350-2000.

Sincerely,



Penny Thompson  
Chair

cc: The Honorable Seema Verma, Administrator, Centers for Medicare & Medicaid Services

## References

Centers for Medicare & Medicaid Services (CMS), U.S. Department of Health and Human Services. 2018. CMCS informational bulletin regarding “Neonatal abstinence syndrome: A critical role for Medicaid in the care of infants.” June 11, 2018. <https://www.medicaid.gov/federal-policy-guidance/downloads/cib060818.pdf>

Medicaid and CHIP Payment and Access Commission (MACPAC). 2015. Chapter 4: Behavioral health in the Medicaid program—people, use, and expenditures. In *Report to Congress on Medicaid and CHIP*. June 2015. Washington, DC: MACPAC. <https://www.macpac.gov/publication/behavioral-health-in-the-medicaid-program%E2%80%95people-use-and-expenditures/>

Medicaid and CHIP Payment and Access Commission and Medicare Payment Advisory Commission (MACPAC and MedPAC). 2018. *Data book: Beneficiaries dually eligible for Medicare and Medicaid*. Washington, DC: MACPAC and MedPAC. <https://www.macpac.gov/publication/data-book-beneficiaries-dually-eligible-for-medicare-and-medicaid-3/>



Medicaid and CHIP Payment  
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