

June 29, 2020

Christie Edwards
Cook County Health
credwards@cookcountyhhs.org

Dear Ms. Edwards,

On behalf of our more than 200 member hospitals and nearly 40 health systems, the Illinois Health and Hospital Association (IHA) thanks you for this opportunity to provide input to improve substance use disorder (SUD) care for Medicaid beneficiaries.

We continue to hear from providers that there are limited options for Medicaid patients to access outpatient/community therapy, citing low reimbursement rates and significant levels of required paperwork as reasons for so few service providers. Increasing reimbursement would be an important step to increase access and accelerate delivery of medication assisted treatment (MAT) and opioid use disorder (OUD) treatment in the community.

There also needs to be better relationships between hospitals and OUD-SUD providers to speed the referral process and time to be seen in the clinic (e.g. same day or next day). Another step is to increase the number of ED physicians who have obtained a data-2000 waiver.

One of the gaps in the continuum of care is the ability for patients to obtain Naloxone kits. Hospitals are not reimbursed for providing Naloxone kits to patients with opioid use disorder (OUD) discharged from the emergency department (ED). It is estimated that prescription filling is only an estimated 15%, meaning 85% of patients discharged from hospitals with a prescription do not obtain the rescue drug. We believe that the best way to standardize delivery of naloxone to those at risk across the hospital community is to establish a central source that can supply kits to hospitals to give to patients with OUD.

The lack of ability to share information among providers inhibits treatment. The CARES Act recently amended 42 CFR Part 2 to allow revocable, one-time permissions to share SUD records, which will be helpful in overcoming this barrier.

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Thank you for the opportunity to provide input. If you have any questions regarding these comments, please reach out to me.

Sincerely,

Dr. Michael Wahl
Medical Director

cc:
Theresa Eagleson
Director
Illinois Department of Healthcare and Family Services
Theresa.Egleson@Illinois.gov