

January 3, 2022

Ms. Mary Anne Sesti
Bureau of Medicaid Policy, Operations, and Actuarial Services
Medical Services Administration
P.O. Box 30479
Lansing, Michigan 48909-7979

RE: Project Number 2157 ESO

Dear Ms. Sesti:

On behalf of Michigan hospitals, the Michigan Health & Hospital Association (MHA) appreciates the opportunity to provide comments on the above referenced proposed policy to clarify dialysis treatment for beneficiaries enrolled in the state's Emergency Services Only (ESO) program.

The Michigan Department of Health and Human Services (MDHHS) indicates in this proposed policy that it believes manifestation of end stage renal disease (ESRD) is an emergency condition. Michigan Medicaid, effective April 1, 2022, proposes to clarify that treatment of ESRD for patients enrolled in the state's ESO program will not be restricted to the hospital emergency department (ED). **The MHA supports this proposal to allow ESO patients to receive ESRD treatment in alternative settings.** We believe this will improve quality of life for these patients and is a key step toward ensuring care is delivered in the most appropriate setting based on each patient's condition and treatment needs. This proposal will also reduce unnecessary volume in the hospital ED setting which is especially important as the COVID-19 pandemic continues.

Please contact me at 517-703-8649 or jjorkasky@mha.org if you have any questions regarding these comments or if you need additional information.

Sincerely,



Jason Jorkasky
Vice President, Health Finance

Brian Peters, Chief Executive Officer