



# Childhood Asthma Leadership Coalition

1110 Vermont Ave NW Suite 900 | Washington, DC 20005

Marilyn Tavenner, Acting Administrator  
Centers for Medicare and Medicaid Services  
U.S. Department of Health and Human Services  
7500 Security Boulevard  
Baltimore, Maryland, 21244

May 7, 2013

Dear Administrator Tavenner:

On behalf of the Childhood Asthma Leadership Coalition, a new multi-sector coalition dedicated to raising awareness and improving public policy to reduce the burdens of childhood asthma, we are writing to offer our support for recent actions by the Department of Health and Human Services to clarify that community prevention efforts are eligible for reimbursement under Medicaid. At a time when health costs are having a significant impact on state and family budgets alike, it is helpful for the Department to provide clear direction and offer states additional flexibility regarding the preventive health services that are reimbursable under Medicaid.

Our organizations have a long history of working on essential issues affecting children with asthma. We recently joined together to form the Childhood Asthma Leadership Coalition with the goal of working collaboratively to accelerate prevention and early interventions to reduce asthma risks by improving symptom prevention, diagnosis, treatment, long-term case management, and improving home-, community-, and school-based interventions with federal policy change and targeted state efforts.

In particular, we were pleased that the January 14, 2013 proposed rule (Medicaid, Children's Health Insurance Programs, and Exchanges: Essential Health Benefits in Alternative Benefit Plans, Eligibility Notices, Fair Hearing and Appeal Processes for Medicaid and Exchange Eligibility Appeals, etc.) (CMS–2334–P; RIN 0938–AR04) aligns federal Medicaid regulations with the enabling Medicaid statute, changing the language to “recommended by a physician or other licensed practitioner...” (emphasis added). As you know, this shift would mean that state Medicaid programs are able to reimburse for the preventive services provided by those professionals that may fall outside of a state’s clinical licensure system as long as the services were initially recommended by a physician or licensed practitioner.

One population who would benefit greatly from this policy change is children with asthma. As the data shows, treating, managing and reducing the burden of childhood asthma requires coordinated evidence-based interventions that integrate community-based approaches into patient care. Asthma counseling/education programs provided in home and community settings lead to improved asthma control by reinforcing treatment plans and taking the management of asthma beyond the doctor’s office. These community-focused interventions, which teach children and their families to proactively manage their condition and mitigate asthma triggers, especially in the home, are fundamental to successful asthma control and show a significant return on investment.

If the proposed rule is adopted as drafted, these sorts of asthma counseling and education services would undoubtedly be reimbursable under Medicaid and children with asthma would be among the clear winners. As you are aware, Massachusetts, under its Section 1115 waiver, will soon begin testing this model in its Pediatric Asthma Pilot Program. With this policy change, we are hopeful that Massachusetts will serve as an

example for other states to improve care coordination through Medicaid-supported community prevention efforts.

Once again, we want to offer our support for your leadership on this important Medicaid policy. We hope we will have the opportunity to work together to develop commonsense policies that reduce health costs while improving health care quality and outcomes for patients across America. If you have any questions or would like to contact the Coalition, please call Lisa Shapiro at 202-657-0675.

Sincerely,

First Focus Campaign for Children  
National Healthy Schools Network  
Asthma and Allergy Foundation of America  
Green & Healthy Homes Initiative  
American Academy of Allergy, Asthma, and Immunology

Trust for America's Health  
Association of Asthma Educators  
Regional Asthma Management & Prevention  
Merck Childhood Asthma Network

