



Nevada Society of Addiction Medicine

A Chapter of American Society of Addiction Medicine

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April 30, 2026

Division of Nevada Medicaid
ATTN: Document Control
4070 Silver Sage Dr.
Carson City, NV 89701

Re: Individuals with Substance Use Disorder as Medically Frail for Purposes of H.R. 1

On behalf of the Nevada Society of Addiction Medicine (NVSAM), the leading medical specialty society representing physicians and other clinicians in Nevada who specialize in the treatment of addiction, thank you for the opportunity to comment on this proposal.

Many of our patients depend on Medicaid to receive treatment for their substance use disorders (SUD). Indeed, Medicaid is the largest third-party payer for SUD services in the country.¹ We understand that maintaining program integrity is an essential goal for your department. We respect this aim. We must also protect potentially life-saving access to treatment for Nevadans with SUD. Our comments seek to strike this balance.

In general, we recommend that Nevada Medicaid implement federal exemptions for medically frail individuals in a manner that minimizes harmful and costly disruptions in Medicaid coverage. More specifically, in H.R. 1, Congress explicitly listed individuals with SUD as being medically frail, exempting them from community engagement requirements.² As written in H.R. 1, this SUD exemption applies to individuals with SUD without conditioning it on other impairments. Our concern is that Nevada's proposed definition for said exemption is too narrow, and people with SUD may suffer as a result.

Below you will see our suggested edits to your proposed definition for this SUD exemption.

The individual has a substance use disorder that meets the diagnostic criteria established in the Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition (DSM-5) ~~and or~~ meets criteria for SUD treatment under the American Society of Addiction Medicine (ASAM) Criteria: Treatment Criteria for Addictive, Substance-Related, and Co-Occurring Conditions, which are adopted by reference in Nevada Administrative Code (NAC) 458.095. ~~A qualifying disorder must involve clinically significant impairment, including functional limitations that interfere with one or more major life activities or the individual's ability to maintain health, safety, or independence.~~

In conclusion, H.R 1's changes to Medicaid will have significant consequences for our members and the patients they serve if implemented incorrectly. Medicaid is a lifeline

for Nevadans with SUD, helping them to afford treatment and live productive and fulfilling lives. We believe it is possible for Nevada to implement reforms aimed at program integrity while also maintaining essential benefits for people who need them. We are happy to assist you in accomplishing this goal.

Thank you for considering our perspective. Please reach out to our leadership directly if we can provide further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Maureen Strohm MD". The signature is written in a cursive style.

Maureen Strohm, MD, FAAFP, DFASAM
President, Nevada Society of Addiction Medicine

¹ <https://www.medicaid.gov/medicaid/benefits/behavioral-health-services>

² <https://www.ama-assn.org/system/files/issue-brief-medicaid-work-requirements-medical-frailty-exemption.pdf>