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August 15, 2022

Kelsey Schell Bureau of Medicaid Policy, Operations, and Actuarial Services Michigan Department of Health and Human Services 333 S. Grand Avenue Lansing, MI 48909

Re: Comments on Project 2214-044, Opioid Health Home (OHH) Expansion

Dear Ms. Schell,

On behalf of the Michigan Society of Addiction Medicine (MISAM), the medical specialty society representing physicians and clinicians in Michigan who specialize in the prevention, treatment, and recovery from addiction, thank you for the opportunity comment on this important topic. The addiction and overdose epidemic continues to significantly impact Michigan, and we greatly appreciate your efforts to ensure that OHHs are a viable treatment option for Michiganders enrolled in Medicaid. OHHs are an essential piece of our response to the addiction and overdose epidemic and an effective mechanism to promote access to and coordination of physical and behavioral health services, as well as long-term services and supports for individuals with SUD. As such, MISAM fully supports the proposed state plan amendment (SPA) to expand OHH services to additional regions in Michigan. If approved, this expansion would ensure that more Michiganders have access to critical, life-saving treatment.

At the same time, we encourage the Michigan Department of Health and Human Services (the Department) to work with MISAM and other stakeholders to consider future SPAs that further expand access to integrated care for not only OUD treatment services, but for other SUDs, as well.

While opioids are responsible for the highest number of overdose deaths, other substances, such as stimulants, form a growing percentage of overdose deaths. Further, about half of all overdose include two or more substances. Alcohol use is another major cause of harm. An estimated 140,000 Americans lose their lives to alcohol-related causes per year. In order to effectively address all forms of SUD and save lives, we encourage the Department to work with MISAM on future SPAs to ensure that health homes are broadened in scope to deliver additional services to treat SUD in Medicaid recipients.

MISAM is ready and willing to to assist the Department in the expanded implementation of this health home, as well as additional health homes in the state of Michigan. Please do not hesitate to contact me at polandc2@msu.edu if there is any way our organization can support you in this or future endeavors.

Sincerely,

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Timothy Gammons, DO, FASAM President, Michigan Society of Addiction Medicine

Cara A. Poland, MD, MEd, DFASAM

Cara Polandudud

Advocacy Chair, Michigan Society of Addiction Medicine

ⁱ Das, L. T., & Kutscher, E. (2020). Stimulant use disorders in the United States—is another epidemic on the horizon? JAMA Health Forum, 1(12). https://doi.org/10.1001/jamahealthforum.2020.1486

ⁱⁱ Centers for Disease Control and Prevention. (2022). Products - vital statistics rapid release - provisional drug overdose data. Centers for Disease Control and Prevention. Retrieved August 11, 2022, from https://www.cdc.gov/nchs/nvss/vsrr/drug-overdose-data.htm

iii Centers for Disease Control and Prevention. (2022). Deaths from Excessive Alcohol Use in the United States. Centers for Disease Control and Prevention. https://www.cdc.gov/alcohol/features/excessive-alcohol-deaths.html