

June 10, 2024

Ms. Kelsey Bowen
Department Specialist
Michigan Department of Health and Human
Services
333 S. Grand Ave
Lansing, MI 48909

Re: MISAM's Support for 2411-BH, Substance Use Disorder Health Homes

Dear Ms. Bowen,

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 to comment on this important topic. We write today to express our support for Project Number 2411-BH, relating to Substance Use Disorder (SUD) Health Homes.

Specifically, this proposed policy would add two eligible diagnoses (alcohol use disorder and stimulant use disorder) for Medicaid recipients to receive coverage at SUD Health Homes. However, we also encourage you to expand upon this proposal to ensure coverage for all forms of SUD under our state's Medicaid program.

As you know, Michigan continues to be significantly impacted by the addiction and overdose crisis. SUD Health Homes are an essential part of a comprehensive response to this ongoing crisis. As such, we are pleased to see the Department propose to add stimulant use disorder and alcohol use disorder as eligible diagnoses at SUD Health Homes. Stimulants form a growing percentage of total overdose deaths. Further, excessive alcohol use is another major cause of substance-related harm. An estimated 180,000 Americans lose their lives to alcohol-related causes per year. As such, this proposal would ensure that more Michiganders have access to critical, life-saving treatment for SUD.

At the same time, we encourage you and your team to expand the scope of this proposal by requiring coverage of integrated care for all SUDs diagnoses listed under the most current Diagnostic and Statistical Manual of Mental Disorders (DSM).<sup>3</sup> In order to respond to the addiction and overdose crisis, we must ensure that all Michiganders with SUD receive coverage for their condition.

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We greatly appreciate the opportunity to comment on this important proposal. We support the addition of stimulant use disorder and alcohol use disorder as eligible diagnoses for SUD Health Homes. However, we also urge you to consider adding all SUDs as eligible diagnoses in a final rule. Please contact me at polandc2@msu.edu if you have questions or concerns.

Sincerely,

Lewei (Allison) Lin, MD, FASAM

President, Michigan Society of Addiction Medicine

Cara A. Poland, MD, MEd, DFASAM

Cara Poladudud

Advocacy Chair, Michigan Society of Addiction Medicine

<sup>&</sup>lt;sup>1</sup> National Institute on Drug Abuse. (2024). *Drug Overdose Death Rates*. National Institutes of Health. <a href="https://nida.nih.gov/research-topics/trends-statistics/overdose-death-rates#:~:text=Those%20involving%20stimulants%2C%20including%20cocaine,(Source%3A%20CDC%20WONDER).">https://nida.nih.gov/research-topics/trends-statistics/overdose-death-rates#:~:text=Those%20involving%20stimulants%2C%20including%20cocaine,(Source%3A%20CDC%20WONDER).

<sup>&</sup>lt;sup>2</sup> Esser, M. B., Sherk, A., Liu, Y., & Naimi, T. S. (2024). Deaths from Excessive Alcohol Use — United States, 2016–2021. MMWR. Morbidity and Mortality Weekly Report, 73(8), 154–161. https://doi.org/10.15585/mmwr.mm7308a1

<sup>&</sup>lt;sup>3</sup> Hartney, E., & Gans, S. (2023). *DSM 5 Criteria for Substance Use Disorders*. Verywell Mind. https://www.verywellmind.com/dsm-5-criteria-for-subs.tance-use-disorders-21926