



March 1, 2019

Christy Blakely
Medical Services Board President
Department of Health Care Policy and Financing
303 E. 17th Street
Denver, CO 80203

RE: MSB 19-01-02-A, Revision to the Federally Qualified Health Center (FQHC) Rule, Section 8.700

Dear Ms. Blakely and Medical Service Board Members:

On behalf of the Colorado Community Health Network (CCHN), I am writing to express support for the proposed revision to the Federally Qualified Health Center (FQHC) rule through MSB 19-01-02-A.

CCHN is the membership association for Colorado's 21 FQHCs, which operate more than 200 clinic sites in 42 counties and care for Coloradans from 61 of the 64 counties in the state. FQHCs are the health care home for more than 790,000 people, including 35% of Medicaid enrollees, 22% of CHP+ enrollees, and 37% of Colorado's uninsured. Over 93% of patients at Colorado FQHCs have family incomes below 200% of the Federal Poverty Level. CCHN's mission is to support FQHCs to increase access to high quality health care for people in need in Colorado.

This rule revision will add antagonist injections for substance use disorders (SUD) provided at the FQHC to the list of services to be paid outside of the FQHC encounter rate. Currently, providing this particular type of Medication Assisted Treatment (MAT) in an FQHC setting is cost-prohibitive for many FQHCs. The price of this type of injection can exceed \$1,000 per injection and FQHCs are currently required to include these costs in their annual cost report, rather than bill for the injection to be reimbursed separately from the encounter. This rule change will allow FQHCs to "carve-out" the costs of this injection from their cost report and bill the injections separately, which will eliminate the cost barriers to FQHCs providing this critical service to Medicaid patients.

Thirteen Colorado FQHCs are currently providing MAT services and several have expressed an interest in, or are already providing, antagonist injections as a part of these services. This rule change will help to increase patient access to these much-needed services in an FQHC setting. CCHN is thankful for the Department's collaborative efforts related to this rule revision and we look forward to continuing to work with the Department on its implementation.

Sincerely,
Polly Anderson

A handwritten signature in black ink, appearing to read "Polly Anderson", written over a light blue horizontal line.

Vice President of Strategy and Financing