

June 28, 2023

On behalf of Howard Brown Health, we submit these comments in regards to the 6/16/23 HFS public notice and opportunity to comment on: HEALTH BENEFITS FOR IMMIGRANT ADULTS (HBIA) AND HEALTH BENEFITS FOR IMMIGRANT SENIORS (HBIS) EMERGENCY RULEMAKING AND HBIA TEMPORARY ENROLLMENT PAUSE.

Howard Brown is a federally qualified health center (FQHC) serving over 35,000 patients annually across Chicago. As a FQHC, we do not turn away any patients for lack of ability to pay or insurance status. As such, FQHCs are often the care homes for immigrant populations. Our benefits enrollment team works closely with our immigrant patients to get them enrolled in HBIA and HBIS, and we've seen firsthand how critical these programs are for expanding access to health coverage and necessary medical treatment. For example, we worked with one immigrant patient who desperately needed insurance because he had cancer. We were able to connect him with HBIA and help him start treatment. His family later reached out to express their gratitude to our benefits enrollment team. While unfortunately the patient passed away, his family noted that the insurance program made a huge difference for them to be able to afford treatment and not have to worry about hospital debt on top of funeral services.

We strongly condemn the recently announced pause to the HBIA program, the threat to cap the HBIS program, and the harmful changes to the cost of coverage in the HBIA and HBIS programs. These reductions and cuts will devastate our community, causing poorer health outcomes due to untreated conditions. In addition, we know that overall healthcare costs increase when patients forego regular, preventative care and only seek medical services when treatable conditions become health emergencies.

The Illinois legislature appropriated \$550 million for FY24 to cover costs in the HBIA and HBIS programs. This is the largest appropriation to date showing how critical the immigrant health programs have been for our communities. The nation is watching Illinois, which has been lauded as a national example of leadership in serving the immigrant community. HFS has lauded the HBIA and HBIS programs as successes; the high numbers of enrolled individuals and the comprehensive primary and specialty care they are receiving are a testament to that success. Now is not the time to go backward and risk the healthcare gains Illinois has made. Now is not the time to ignore one of the significant lessons from the pandemic: our community health is interconnected and when one large group has no meaningful access to healthcare, our community suffers.

We are disappointed that these changes were announced on June 16th before the fiscal year has even begun, without any evidence of enrollment trends and spending to justify this

immediate and extreme action. Leaders in the community have repeatedly asked to meet with the agency and the Governor's office to discuss a shared goal to cover as many people as possible with the funds available. Instead of entering a discussion, these extreme measures were announced with no advance notice.

The pause to the HBIA population is unwarranted until data justifying the current enrollment trends and costs are transparently disseminated. The proposed cap on the HBIS population is arbitrarily set at 16,500 with no data or explanation as to how that number was reached or why the available funds dictate a cap. The various co-payments are vague, costly, and will be difficult to administer and enforce. It will be nearly impossible for HBIA or HBIS patients, let alone providers, to know until AFTER a full evaluation or work-up in the emergency room whether the HBIS/HBIA patient's symptoms qualify as a serious medical emergency; and it is impossible for these patients and providers to know beforehand whether the emergency treatment or inpatient hospitalization would qualify under the technical federal emergency Medicaid definition.

We request that Governor Pritzker and HFS rescind this change in policy immediately and meet with the immigrant community and members of the Illinois General Assembly to ensure that healthcare truly is a right, not a privilege in our state.

Sincerely,

David Ernesto Munar
President and CEO