



May 23, 2018

William Snyder  
Director, Medical Services  
South Dakota Department of Social Services  
700 Governors Drive, Kneip Building  
Pierre, SD 57501-2291

Dear Mr. Snyder:

Our organizations write to ask you to withdraw the 1115 Demonstration Proposal released on May 22, 2018, as it fails to meet federal public notice and comment requirements for Section 1115 waivers.

The undersigned organizations represent millions of individuals facing serious, acute and chronic health conditions across the country and in South Dakota. Our organizations have a unique perspective on what individuals need to prevent disease, cure illness and manage serious and chronic health conditions. The diversity of our groups and of those we represent enables us to draw upon a wealth of knowledge and expertise and serve as an invaluable resource regarding any decisions affecting the Medicaid program and the people that it serves.

The federal rules at 431.408 pertaining to state public comment process require at (a)(1)(i)(C) that a state include an estimate of the expected increase or decrease in annual enrollment and expenditures if applicable. The intent of this section of the regulations is to allow the public to comment on a Section 1115 proposal with adequate information to assess its impact. However, on page 9 of this demonstration proposal, South Dakota states that it cannot predict the impact of the waiver on enrollment or expenditures. However, in order to meet these transparency

requirements, South Dakota must include these projections and their impact on budget neutrality provisions.

Again, we request you to withdraw this waiver until this information can be provided so that the public has an opportunity to comment on this important issue with adequate information.

Sincerely,

American Cancer Society Cancer Action Network  
American Heart Association  
American Lung Association  
Epilepsy Foundation  
Hemophilia Federation of America  
Hemophilia Foundation of Minnesota/Dakotas  
Leukemia and Lymphoma Society  
National Alliance on Mental Illness  
National Multiple Sclerosis Society