

February 6, 2022



Renae Hericks  
Policy and Program Manager  
Division of Medical Services  
South Dakota Department of Social Services  
700 Governors Drive  
Pierre, SD 57501-2291

**Re: South Dakota Medicaid State Plan Amendment # SD-23-0001, SD-23-0002, and SD-23-0003**

Dear Ms. Hericks:

The American Cancer Society Cancer Action Network (ACS CAN) appreciates the opportunity to comment on the amendments to the South Dakota state Medicaid plan to implement Constitutional Amendment D. ACS CAN is making cancer a top priority for public officials and candidates at the federal, state, and local levels. ACS CAN empowers advocates across the country to make their voices heard and influence evidence-based public policy change, as well as legislative and regulatory solutions that will reduce the cancer burden. As the American Cancer Society's nonprofit, nonpartisan advocacy affiliate, ACS CAN is more determined than ever to end cancer as we know it, for everyone.

ACS CAN was a leader in our state in support of Constitutional Amendment D and expanding Medicaid. South Dakotans' vote to make their state the 39th state to increase access to Medicaid is a major victory for public health and will improve the lives of many cancer patients, survivors and their loved ones who will newly gain access to lifesaving health insurance coverage. American Cancer Society research repeatedly shows the importance of access to care in reducing health disparities and improving cancer outcomes.

South Dakota voters sent a clear message about their support for expanding Medicaid to over 42,000 individuals. Medicaid expansion will create new opportunities for Native American residents to access health care outside of Indian Health Service (IHS) facilities and provide increased funding opportunities for rural hospitals and clinics. South Dakota has the highest rate of rural and small town uninsured in the country. Medicaid expansion will help reduce disparities by decreasing the rural uninsured rate.

**We strongly support State Plan Amendments SD-23-0001, SD-23-0002, and SD-23-0003;** which implement this expanded eligibility and establish how the expanded adult population will be covered. We support South Dakota's proposal to provide the same coverage to the expanded adult population as the state provides to its current Medicaid populations, as this will create administrative efficiencies and prevent confusion among enrollees and providers.

As you well know, your Department will be implementing Medicaid expansion in the same timeframe as it is 'unwinding' from the Covid-related maintenance of effort requirements, conducting a large amount of

February 6, 2022



eligibility redeterminations, and returning to more normal operations. We encourage you to plan carefully for this reality and conduct both of these processes in a way that minimizes coverage disruption and maximizes access to care as much as possible. To accomplish this goal, we urge the Department to clearly communicate its plans and new procedures with South Dakota partners, patients, providers and potential enrollees – including providing trainings for organizations who help potential enrollees and conducting regular meetings with partners. Additionally, while we understand that eligibility redeterminations for current enrollees must begin before the expansion implementation date, we encourage the Department to conduct these redeterminations in such a way that will minimize churn and dis-enrollments caused by using eligibility criteria prior to when it expands on July 1, 2023. For example, the Department could consider prioritizing eligibility redeterminations for categories of enrollees that are not likely to change based on Medicaid expansion while the state prepares its systems and processes for expansion in July. Lastly, we always encourage the Department to make applying and re-applying for Medicaid as easy as possible for applicants, including by using existing state data sources to support eligibility determinations and re-determinations.

ACS CAN appreciates the opportunity to provide comments on this proposal. We strongly support these proposed state plan amendments and Medicaid expansion in South Dakota. If you have any questions, please feel free to contact [insert info].

Sincerely,

A handwritten signature in dark ink, appearing to read "M McLarty".

Matthew McLarty  
Government Relations Director, South Dakota  
American Cancer Society Cancer Action Network