



July 7, 2021

Centers for Medicare and Medicaid Services
Administrator Chiquita Brooks-LaSure
7500 Security Boulevard
Baltimore, MD 21244

Submitted via <https://1115publiccomments.medicaid.gov/>

Dear Administrator Brooks-LaSure,

On behalf of Vitalyst Health Foundation, thank you for the opportunity to provide comments on the Arizona Health Care Cost Containment System's (AHCCCS) proposed Housing and Health Opportunities (H2O) 1115 Waiver Amendment. AHCCCS' recent efforts to address social risk factors provide further evidence of the program's dedication to whole person care and reaffirms its standing as a national leader among state Medicaid programs. We are confident the H2O waiver amendment will continue building on AHCCCS' success by connecting Arizonans to critical services and conditions that ultimately produce health. As one of Arizona's largest health foundations, we are thrilled to offer our support for this innovative and transformative program.

Housing insecurity and homelessness in Arizona are multifaceted problems that require an all-hands-on-deck approach. The latest research shows that Arizona is experiencing the fourth worst affordable housing shortage in the country for households with extremely low incomes. As of 2020, there are more than 10,000 individuals experiencing homelessness across the state, and estimates indicate that 200,000 additional homes are needed to address the needs of those who are homeless and housing insecure. Fortunately, a growing number of cross-sector partners are recognizing the need to address these issues. The state legislature recently committed to investing in a low-income housing tax credit program; regional homelessness coalitions are emerging; and the state is building a network to connect social and medical providers that will, in part, open new doors to housing support services.

The H2O proposal has the potential to take advantage of, and contribute to, this momentum by building on proven strategies that improve care and decrease costs. Based on recent data from AHCCCS and its plans, we know that the provision of stable housing and supports is associated with significant decreases in emergency department and in-patient visits, and saves up to \$5500 per member per month.

Vitalyst Health Foundation also supports AHCCCS' use an equity lens by focusing H2O toward populations experiencing the greatest need. This includes but is not limited to communities living with mental illness, addiction and other chronic conditions; pregnant women; individuals with complex needs that result in high costs; people who repeatedly present in emergency departments; former foster youth ages 18-24; and the elderly who are able to move out of an institutional setting. This commendable approach underscores the importance of equitable resource allocation to ensure that the populations with the greatest need are prioritized during program implementation. To that end, we have encouraged AHCCCS to place an emphasis on, and make public, disaggregated sociodemographic data



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about the populations served by H2O. This will help ensure that the program is successful in addressing the needs of historically disadvantaged populations.

We thank you again for this opportunity to provide comments on AHCCCS' promising H2O waiver amendment. Vitalyst Health Foundation is available to provide further support as needed.

Sincerely,

A handwritten signature in cursive script, appearing to read "Suzanne Pfister".

Suzanne Pfister
President and CEO
Vitalyst Health Foundation