
19 May 2022

Office of Health Insurance Programs
New York Department of Health
One Commerce Plaza
Albany, NY 12207

Dear Medicaid Redesign Team:

This letter is submitted as a public comment on the proposal for New York's Section 1115 Research and Demonstration Waiver #11-W-00114/2. As health care providers, researchers, advocates and community-based organizations who work on children's health, we commend you for focusing the proposal for New York's next Medicaid waiver on health equity and eliminating health disparities. We applaud the four goals of the proposal. They represent an unprecedented opportunity to improve the health of New Yorkers.

Despite the fact this waiver is focused on equity, the investments in the current proposal are not aligned with the needs of the poorest and most diverse population of New Yorkers who rely on Medicaid: children. In New York, Medicaid covers 50% of births each year, 60% of children ages 0 – 3 years, and 40% of children ages 0 – 18 years, but the proposal fails to address the racial and ethnic disparities in maternal and infant morbidity and mortality, glaring disparities in early childhood health, or the overwhelming crisis New York is facing in youth mental health.

Without an explicit and specific focus on children in the waiver, New York will fail to achieve its four proposed goals. We call on the New York State Department of Health to amend its proposal to explicitly prioritize incentives and payment methodologies in seven areas:

Goal: Build a resilient, flexible and integrated delivery system to reduce health disparities

1. **Mental health needs of youth:** Build stronger partnerships with schools, including expanding primary care and mental health clinics in schools, funding more school-based mental health providers, and providing universal screening for anxiety and depression to school-age children.
2. **Two-generation approaches:** Place behavioral health specialists in pediatric and primary care practices to address emerging mental health needs of both mothers and young children.
3. **Maternal health:** Provide tobacco cessation interventions during pregnancy, early screening and treatment of maternal anxiety and depression, post-partum long-acting reversible contraception to reduce short inter-pregnancy intervals, and increased referral to parent support programs, including home visitation.

Goal: Redesign and strengthen system capabilities to advance health equity

4. **Continuous Medicaid coverage:** Guarantee coverage for children and their mothers from birth to age 3 years.
5. **Universal home visitation:** Cover universal home visitation for parents of all newborns to reduce maternal and infant mortality and morbidity.
6. **Developmental screenings:** Cover comprehensive early childhood developmental and social-emotional screenings in partnership with community partners and provided in community settings.

Goal: Create statewide digital health and telehealth infrastructure

7. **Internet service and equipment:** Cover service and equipment for households to facilitate parents' access to telehealth, especially for families with young children.

The goals of health equity cannot be achieved without addressing the health disparities that begin at birth:

- Black women in New York are 5 times more likely to die of pregnancy-related causes than white women.
- Black infants in New York are more than twice as likely to die in the first year of life than white infants.
- Only 17% of children in New York receive comprehensive developmental screenings to identify and address early childhood developmental delays and disabilities.
- New York state ranks 27th of the 50 states for overall child well-being.

Of particular concern is the need for a resilient, flexible and integrated delivery system to address the mental health needs of children and youth. By every account, youth in the United States are in a mental health crisis, one that has been both more revealed and exacerbated by the pandemic. National evaluations have shown that 71% of parents say the pandemic has taken a significant toll on their child's mental health. In Monroe County, a recent poll of parents indicated that 5 out of 10 said they have at least one child who has struggled with mental health issues during the pandemic – those numbers were even higher for parents of teenagers, parents in the City of Rochester and parents of children with developmental delays and disabilities. Yet, the current proposal does not address youth mental health with any planned implementation or investment. **We urge you to invest in youth mental health at least equal to the \$1.5 billion designated for homeless and long-term institutionalized populations.**

The waiver needs to explicitly and specifically indicate that children with mental health concerns are a priority population and must be addressed with this funding innovation. Healthy growth and development of children today will bring long-term value to Medicaid and other public systems, including but not limited to education, child welfare and juvenile justice. We are available to provide further information and advice, should it be helpful when incorporating these recommendations into a revised proposal.

Sincerely,

Accountable Health Partners
Action for a Better Community
Adirondack Birth to Three Alliance
Alliance for Quality Education
American Academy of Pediatrics, New York State Chapter
Bivona Child Advocacy Center
Black Agenda Group
Black Nurses Association
Catholic Charities Family & Community Services
Center for Teen Empowerment
Chemung County Comprehensive Interdisciplinary Developmental Services
Child Care Council
Children's Defense Fund-NY

Children's Health Home of Upstate New York
Children's Institute
Church Women United in New York State
Citizen Action of New York
Citizens Committee for Children of New York
Collaborative for Children and Families
Community Place of Greater Rochester
Docs for Tots
Early Childhood Development Initiative of Rochester – Monroe County Advocacy Committee
Early Childhood Education Quality Council
Education Success Foundation
Education Trust-NY
EnCompass: Resources for Learning
Family Service Society, Inc.
Florence M. Muller Foundation
Foodlink
Generations Child Care
Golisano Children's Hospital at the University of Rochester Medical Center
Golisano Institute for Developmental Disability Nursing, St. John Fisher College
Greater Rochester Summer Learning Association
Healthy Steps, a program of Zero to Three
Hillside Family of Agencies
Ibero-American Action League
Institute for Collaborative Leadership
LiftOff-Western NY
March of Dimes
Mt. Hope Family Center
Nazareth College
Oishei Children's Hospital of Buffalo
Partners in Community Development / BIPOC PEEEEEEK Project
Prevent Child Abuse New York
ROC the Future Alliance
Rochester Area Community Foundation
Rochester Coalition Against Human Trafficking
Rochester Education Fellowship
Rochester Hearing and Speech Center
Rochester Regional Health School-Based Health Centers
Schuyler Center for Analysis and Advocacy

Society for the Protection & Care of Children
The Center for Youth
The Children's Agenda
United Way of Greater Rochester and the Finger Lakes
University of Rochester Medicine Department of Obstetrics and Gynecology
Urban League of Rochester
Westchester Children's Association
YWCA of Rochester & Monroe County