February 20, 2024

Elizabeth Hertel, Director of the Michigan Department of Health and Human Services (MDHHS)
Michigan Department of Health and Human Services
PO Box 30195
333 S. Grand Ave.
Lansing, MI 48909

CC: Meghan Hodge-Groen, Senior Deputy Director, Behavioral and Physical Health and Aging Services Administration; Brad Barron, Director, Managed Care Plan Division; and Penny Rutledge, Director, Bureau of Medicaid Care Management and Customer Service

Dear Director Hertel,

On behalf of the Michigan Produce Prescription (PPR) Statewide Learning Network, the Michigan PPR Steering Committee would like to offer comments following the release of the Request for Proposals (RFP) for the Comprehensive Health Care Program for Michigan's Medicaid health plans.[1] This committee, founded by the Michigan Farmers Market Association (MIFMA), provides leadership for the statewide coalition focusing on policy, systems and environmental change for sustaining and expanding Produce Prescription Programs in Michigan. We are encouraged to see the MIHealthyLife Initiative's continued support of the health of Michigan Medicaid beneficiaries through promotion of Social Determinants of Health (SDOH) and associated Health-Related Social Needs (HRSN) services within the recent RFP.[2] We value the opportunity that has been presented to incorporate these health equity services as In Lieu of Services (ILOS) in partnership with diverse community-based providers, settings of care, delivery systems, and programs.

We request that you consider inclusion of Produce Prescription Programs as one of the community-based resources the Department will approve as an ILOS option to address the Medicaid population's nutritional and food security needs.[3]

As of 2020, it is estimated that over 1.9 million Michiganders faced food insecurity, including 552,000 children.[4] Michigan's elevated food insecurity levels highlight a wide lack of access to an adequate and nourishing diet, and underscore the intersection between food security, nutrition, the prevalence of diet-related chronic diseases, and associated healthcare costs.[5] Lack of access to nutrient-dense fruits and vegetables can prevent proper management of health and/or chronic disease leading to elevated healthcare usage and associated costs. As highlighted by the COVID-19 pandemic, disparities in food security and access to healthcare resources are found within low-income populations and communities of color. The disproportionate number of barriers and costly consequences experienced by vulnerable

[1]Michigan Farmers Market Association. (2023, February). *Produce Prescription Programs Statewide Learning Network Snapshot*. https://mifma.org/wp-content/uploads/2023/07/Produce-Prescription-One-Pager-Update-2.20.23-HAL.pdf
[2]Michigan Department of Health and Human Services. (n.d.). *MIHealthyLife*. Health and Human Services. https://www.michigan.gov/mdhhs/MIHealthyLife
[3]Michigan Farmers Market Association. (n.d.) *Produce Prescription Programs*. https://mifma.org/for-markets/produce-prescription/
[4] Governor's Food Security Council. (2022, February 07). *Food Security Council Final Report*. https://www.michigan.gov/-/media/Project/Websites/mdhhs/Folder2/FSC_Final_Report1.pdf?rev=a649563170a9477892c247f254e4dac2
[5]Michigan Farmers Market Association. (2023). *The Case for Produce Prescription Programs in Michigan*. https://mifma.org/wp-content/uploads/2023/11/MIFMA.TheCaseForProducePrescriptionPrograms.10.25.23-DIGITAL.pdf

populations can be mitigated by targeting at-risk populations with interventions that equitably respond to the critical link between nutrition access and health, such as Produce Prescription Programs.

The Center for Medicare and Medicaid Services (CMS) recently released two guidance documents in January and November 2023, alongside an associated coverage table directly recognizing nutrition prescriptions.[6] [7] [8] These programs include but are not limited to fruit and vegetable prescriptions, healthy food vouchers, and food pharmacies, as a federally allowable HRSN service under Medicaid for ILOS coverage. CMS has released additional guidance detailing opportunities for ILOS and settings in Medicaid Managed Care, but these are of utmost relevance for Produce Prescriptions inclusion in the MDHHS pre-approved ILOS options to address food insecurity and reduce future state-plan covered healthcare costs.

Application of the relevant CMS guidance can be seen through other state's success with leveraging fruit and vegetable prescription programs, such as Produce Prescriptions, and other Food Is Medicine-style initiatives as an ILOS benefit. For example,

- California has identified healthy food vouchers and food pharmacies in their California Community Supports, or ILOS guide.[9]
- New York and Rhode Island have indicated pre-approval for the covered provision of medically-tailored meals, another Food Is Medicine initiative, in guidance documents for their state Medicaid Managed Care Plans.[10] [11]
- Washington, in its recently approved Section 1115 Medicaid Demonstration Waiver, mentions using ILOS benefits to provide access for HRSN's for managed care populations, which following the recent CMS guidance, we can assume to include fruit and vegetable prescription programs. [12]

The evolving evidence-base for Food Is Medicine nationwide warrants increased inclusion of medically-supportive food security programs as an approved HRSN support for Medicaid populations, often through ILOS or Section 1115 Medicaid Demonstration Waivers. Nationally, there are multiple Produce Prescription positive health and economic impact findings published including a recent, multi-site evaluation from 9 Produce Prescription Programs across 12 US states where patients with poor cardiometabolic health, risk for cardiovascular disease, and/or identified as food insecure participated in a Produce Prescription program resulting in increased fruit & vegetable intake, food security, and improved health status for adults and children–including clinically relevant improvements in glycated

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[6] Centers for Medicare & Medicaid Services. (2023, January 04). *SMD #: 23-001 Re: Additional Guidance on Use of In Lieu of Services and Settings in Medicaid Managed Care*. https://www.medicaid.gov/federal-policyguidance/downloads/smd23001.pdf

[7] Centers for Medicare & Medicaid Services. (2023, November 16). *Coverage of Services and Supports to Address Health-Related Social Needs in Medicaid and the Children's Health Insurance Program* [CMCS Informational Bulletin]. https://www.medicaid.gov/sites/default/files/2023-11/cib11162023.pdf

[8] Centers for Medicare & Medicaid Services. (2023, November 16). *Coverage of Health-Related Social Needs (HRSN) Services in Medicaid and the Children's Health Insurance Program*. https://www.medicaid.gov/sites/default/files/2023-11/hrsn-coverage-table.pdf.

[9] California Department of Health Care Services. (2023, July). *Medi-Cal Community Supports, or In Lieu of Services (ILOS) Policy Guide*. https://www.dhcs.ca.gov/Documents/MCQMD/DHCS-Community-Supports-Policy-Guide.pdf.

[10] New York State Department of Health. (2023, June). *New York State Medicaid Managed Care Alternative Services and Settings - In Lieu of Services (ILS)*. Managed Care. https://www.health.ny.gov/health_care/managed_care/app_in_lieu_of_svs_mmc.htm.

[11] Rhode Island Executive Office of Health and Human Services. (2021, August). *Executive Office of Health and Human Services Medicaid Managed Care Policy and Procedure In Lieu of Services*. https://eohhs.ri.gov/sites/g/files/xkgbur226/files/2021-11/eohhs_mco_core_contract_requirements-for-requesting-in-lieu-of-services-final-2021-08-19.pdf

[12] Centers for Medicare & Medicaid Services. (2023, June 30) *Washington Medicaid Transformation*. https://www.medicaid.gov/sites/default/files/2023-06/wa-medicaid-transformation-ca-06302023.pdf.

hemoglobin, blood pressure, and body mass index for adults with poor cardiometabolic health.[13] Other impact findings, like this study from Tufts University Friedman School of Nutrition Science and Policy as well as evidence found here in Michigan, builds upon these positive health outcomes and behavior changes with further evidence of Produce Prescriptions' capacity for long-term, multi-faceted economic benefits further detailed below.[14] [15]

Research shows that fruit and vegetable intake is a proactive approach to chronic disease prevention, positively impacting chronic conditions such as obesity, cardiovascular disease, diabetes, and depression. [16]This would positively contribute to a reduction in ninety percent of the U.S.'s 3.5 trillion annual healthcare expenditure that is spent treating chronic conditions.. Efforts to reduce Michigan's food insecurity rates and the approximate $1,801,282,000 of associated annual healthcare costs can be addressed through Produce Prescriptions' healthy behavior interventions for those who are at risk of developing, or currently suffering from, a chronic disease.[17] Even increasing produce intake from less than 0.5 cup/day to greater than 1.5 cups/day, which is the minimum amount recommended by the Centers for Disease Control and Prevention, could save $1,568 per person per year in cardiovascular disease treatment costs, nationally.[18]

Providing chronic disease patients with nutrition prescriptions for fresh fruits and vegetables in conjunction with nutrition counseling and community-based resources, we expect to see reductions or eliminations in healthcare services and costs associated with emergency room visits, inpatient and outpatient hospitalizations, emergency transport services, and other acute care needs Additionally, Produce Prescriptions' capacity for impacting patient, provider, and state healthcare utilization cost savings can build upon MIHealthyLife Initiative's strategic pillars and equitably strengthen both patient-provider and patient-community relationships.[19]

Under the Michigan Produce Prescription Steering Committee and Statewide Learning Network, the collective memberships of the organizations listed below support and are prepared to collaborate with MDHHS to set ILOS rates, identify funding reimbursement, incentivize health plan buy-in, learn from what is working in other states, and support the favorable implementation of this innovative nutrition and health equity programming recommendations in Michigan. We understand that open dialogue and collaboration are essential, and are eager to discuss how we can work together to support the five pillars of MIHealthyLife to create an equitably healthier and more resilient Michigan.

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[13] Hager, Kurt et al., (2023, August). Impact of Produce Prescriptions on Diet, Food Security, and Cardiometabolic Health Outcomes: A Multisite Evaluation of 9 Produce Prescription Programs in the United States. *Circulation: Cardiovascular Quality and Outcomes*, *vol.16* (Issue no. 9), Page e009520. https://doi.org/10.1161/CIRCOUTCOMES.122.009520

[14] Wang, Lu et al., (2023, August). Health and Economic Impacts of Implementing Produce Prescription Programs for Diabetes in the United States: A Microsimulation Study. *Journal of the American Heart Association*, *Volume 12* (Issue 15). https://doi.org/10.1161/JAHA.122.029215.

[15]Michigan Farmers Market Association. (2023, October 25). *The Case for Produce Prescription Programs in Michigan.* https://mifma.org/wp-content/uploads/2023/11/MIFMA.TheCaseForProducePrescriptionPrograms.10.25.23-DIGITAL.pdf.

[16]Michigan Farmers Market Association. (2021, January). *Produce Prescription Program Health Impact Analysis.* https://mifma.org/wp-content/uploads/2021/05/Produce-Prescription-Program-Health-Impact-Analysis-1.pdf.

[17] Governor's Food Security Council. (2022, February 7). *Food Security Council Final Report.* https://www.michigan.gov/-/media/Project/Websites/mdhhs/Folder2/FSC_Final_Report1.pdf?rev=a649563170a9477892c247f254e4dac2.

[18]Zhang, Donglan et al., (2017, November). Evidence of Dietary Improvement and Preventable Costs of Cardiovascular Disease. *The American Journal of Cardiology Volume 120* (Issue 9), Pages 1681–1688. https://www.ajconline.org/article/S0002-9149(17)31241-9/pdf.

[19]Michigan Department of Health and Human Services. (2023, April 7) *MI Healthy Life will strengthen health care coverage for Michiganders*. Health & Human Services. https://www.michigan.gov/mdhhs/inside-mdhhs/newsroom/2023/04/07/mihealthylife.

Sincerely,

Michigan Produce Prescription Steering Committee

[Organization Name, Affiliated Produce Prescription Program (if applicable)]

- Michigan Health & Hospital Association
- Food Bank Council of Michigan
- Michigan Association of Health Plans
- Michigan Department of Health and Human Services Division of Chronic Disease and Injury Control
- Michigan Farmers Market Association
- Eastern Market Partnership, Fresh Prescription
- MyMichigan Health, Prescription for Health
- Inter-Tribal Council of Michigan, Inc.
- Upper Peninsula Commission for Area Progress (UPCAP), The UP Food as Medicine Program
- Meijer
- Washtenaw County Health Department, Prescription for Health

Michigan Produce Prescription Statewide Learning Network

[Name or Organization, Affiliated Produce Prescription Program (if applicable), *County*]

Organizations

- Henry Ford Health, Fresh Prescription, *Wayne*
- GenesisHOPE, Fresh Prescription, *Wayne*
- Greater Brighton Area Chamber of Commerce, Prescription for Health, *Livingston*
- Eastern Market Partnership, Fresh Prescription, *Wayne & Oakland & Macomb*
- Mid-Michigan District Health Department, Live Well Gratiot Prescription for Health, *Gratiot & Montcalm & Clinton*
- Livingston County Health Department, Livingston County Prescription for Health, *Livingston*
- Access of West Michigan, Refresh Now, *Kent*
- District Health Department #10, Prescription for Health, *Crawford & Kalkaska & Lake & Manistee & Mason & Mecosta & Missaukee & Newaygo & Oceana & Wexford*
- Michigan State University-Hurley Pediatric Public Health Initiative, Fruit and Vegetable Prescription Program, *Genesee*
- Carefree Medical, Capital Area Prescription for Health, *Ingham*
- Midland Business Alliance, Prescription for Health, *Midland*
- Growing Hope, Prescription for Health, *Washtenaw*
- Marquette Food Co-op / UPFE, U.P Food as Medicine Program, *Marquette*
- McLaughlin Grows Urban Farm, Muskegon Prescribes Food for Health, *Muskegon*
- Menominee Historic Downtown Farmers Market, U.P Food as Medicine Program, *Menominee*
- Joy Southfield Community Development Corporation, Fresh Prescription, *Wayne*
- Downtown Marquette Farmers Market, U.P. Food as Medicine, *Marquette*
- Grace Health, Grace Health Fresh Food Pharmacy, *Calhoun*

- Trinity Health Michigan, Washtenaw County Prescription for Health & Rx for a Healthy Oakland & Grand Rapids Rx for Health, *Statewide*
- McLaren Health Plan, *Statewide*
- National Produce Prescription Collaborative, *Nationwide*
- Asthma & Allergy Foundation of America - Michigan Chapter, *Oakland*
- East Lansing Farmers Market, *Ingham*
- St. Louis Farmers Market, Live Well Gratiot Prescription for Health, *Gratiot*
- Michigan League for Public Policy, *Statewide*
- Reciprocity, *Oakland*
- Friends of Lincoln Park Farmers Market, *Wayne*
- Groundwork Center for Resilient Communities, *Statewide*

Individuals

- Jeanine C. Hatcher, Fresh Prescription, *Wayne*
- Jennifer Lucarelli, PhD, Rx for a Healthy Oakland, *Oakland*
- Darah Gendernalik, DO MPH, *Berrien*
- Erin Steward, Live Well Gratiot Prescription for Health, *Gratiot*
- Tara Herald, Prescription for Health, *Isabella*
- Tess Kilian, Livingston County Prescription for Health, *Livingston*
- Brittany Tayler, Fruit and Vegetable Prescription Program, *Genesee*
- Bridget Farmer, Fruit and Vegetable Prescription Program, *Genesee*
- Selena Asberry-Goss, *Wayne*
- Karren Campbell, PhD, *Genesee*
- Sarah Egan, Fruit and Vegetable Prescription Program, *Genesee*
- Linda Goldsberry, Fruit and Vegetable Prescription Program, *Genesee*
- Katie Hacker, Fruit and Vegetable Prescription Program, *Genesee*
- Kimberly Pulka, Fruit and Vegetable Prescription Program, *Genesee*
- Amy Saxe-Custack, Fruit and Vegetable Prescription Program, *Genesee*
- Ronda Tousciuk, Prescription for Health, *Midland*
- Kyle Warner, Munson Prescription for Health, *Grand Traverse*
- Lauren Boone, Fresh Prescription, *Oakland*
- Gratia Lee, Refresh Now, *Kent*
- Katie Miller, MPH CHES, *Crawford & Kalkaska & Lake & Manistee & Mason & Mecosta & Missaukee & Newaygo & Oceana & Wexford*
- Kaitlin Nicole Harwood-Schelb, Fruit and Vegetable Prescription Program, *Genesee*
- Caitlin M Lorenc, *Benzie*
- Jessica Frantz, *Alpena*
- Anna Fischer Colby, *Ingham*
- Adrienne Davenport, *Ingham*
- Kelly Wilson, *Washtenaw*
- Imari E. Smith, *Genesee*
- Kylie Davis, *Kent*
- Alexander Steward, *Wayne*
- Adeline Harting, *Ingham*
- Chloe K, *Ottawa*
- Debbie Fisher, *Wayne*
- Abigail Rentschler Maidlow, *Ingham*