



STATE OF IOWA

CHESTER J. CULVER, GOVERNOR
PATTY JUDGE, LT. GOVERNOR

DEPARTMENT OF HUMAN SERVICES
CHARLES J. KROGMEIER, DIRECTOR

March 17, 2010

Office of Health Plan Standards and Compliance Assistance
Employee Benefits Security Administration
Room N-5653
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Attention: Employer CHIP Notice

To Whom it May Concern:

This is in response to the solicitation for comments regarding 'Publication of Model Notice for Employers to Use Regarding Eligibility for Premium Assistance under Medicaid or the Children's Health Insurance Program, Notice' in Federal Register/Vol.75, No. 23/Thursday, February 4, 2010.

Iowa believes the first paragraph of the notice should more clearly state that in order to participate in a state's premium assistance program, individuals must also be enrolled in a state's Medicaid or CHIP program. Within a few days of employers issuing this notice in Iowa, the State received numerous applications for and dozens of phone calls about our Health Insurance Premium Payment (HIPP) program from individuals who are not enrolled in Medicaid. Subsequent discussions with these individuals revealed that they did not understand the requirement and most likely would not qualify. A number of inquiries were from absent parents who were interested in the State paying premiums for court-ordered medical support to meet child support obligations. Therefore, at a minimum, we recommend the language be amended as follows:

*"If you or your family members are eligible for your State's Medicaid or CHIP program **and** you are eligible for health insurance from your employer, some States have premium assistance programs that can help pay for the employer coverage if you are unable to afford it."*

We also recommend adding the following headers above the appropriate paragraphs to further emphasize the link between Medicaid, CHIP and premium assistance programs.

'Currently Enrolled in Medicaid or CHIP'
'Not Currently Enrolled in Medicaid or CHIP'

Thank you for consideration of our comments. If you have questions, please contact Anita Smith at 515-281-8791 or by e-mail at asmith@dhs.state.ia.us.

Sincerely,

Jennifer H. Vermeer
Iowa Medicaid Director

JHV/as