



Public Comment to Michigan Department of Health and Human Services on Provider Enrollment Fitness Criteria

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I am writing to you today as the Strengthening Flint Families research coordinator at the Flint Center for Health Equity Solutions based in the Michigan State University College of Human Medicine Division of Public Health under PI Dr. Debra Furr-Holden. Our mission is to make effective and evidence-based substance use prevention and treatment programs available to all Flint residents. This mission will be severely compromised by proposed policy changes to the Provider Enrollment Fitness Criteria. The Michigan Department of Health and Human Services (MDHHS) proposed additions to the federal and state mandated list of exclusions would result in the large scale termination of professional providers currently providing Substance Abuse and Recovery Support services within two months of President Trump identifying the opioid epidemic as a public health crisis.

These concerns are specifically directed towards itemized exclusions #5 and #6 and in regards to providers who have federal or state felony or misdemeanor convictions within the preceding 10 years. A list which includes:

- Assault, battery and domestic violence;
- Fraud, forgery, counterfeiting, embezzlement and tax evasion;
- Larceny, burglary, robbery, extortion, false pretenses, false representation, and conversion;
- Prostitution;
- Drug crimes including, but not limited to: possession, delivery, and manufacturing