



# THE PARTNERSHIP FOR MEDICAID

December 18, 2019

Seema Verma, MPH  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attention: CMS-2393-P  
P.O. Box 8016  
Baltimore, MD 21244

**Re: Extension Request for Medicaid Program; Medicaid Fiscal Accountability Regulation; *Federal Register*, Vol. 84, No. 222, November 18, 2019 [CMS-2393-P]**

Dear Administrator Verma:

The Partnership for Medicaid is a nonpartisan, nationwide coalition made up of organizations representing doctors, health care providers, safety net plans, counties, and labor. The goal of the coalition is to preserve and improve the Medicaid program.

On November 18 CMS released the proposed rule, "*Medicaid Program; Medicaid Fiscal Accountability Regulation*." We appreciate CMS' stated goal of strengthening the overall fiscal integrity of the Medicaid program through this proposed rule. However, we are concerned about the limited timeframe available to stakeholders to offer meaningful, data-driven comments given the magnitude of CMS' proposals.

Given the complexity of these arrangements, both states and stakeholders will need time to fully assess the impact of the proposed changes and the degree to which these changes will impact both their Medicaid and overall state budgets. As advocates for the Medicaid program, our member organizations provide care and support millions of Medicaid enrollees and would also be affected by changes to the financing of health care services.

Of notable importance, comments are due when State Legislatures will have just begun Winter/Spring sessions in early to mid-January. Due to the magnitude of the state impacts, State Legislatures will need to be consulted on this impact and provide related state comments on the proposed rule.

In light of these concerns, we urge CMS to extend the NPRM comment period for an additional 60 days, or no earlier than March 17, 2020. Thank you for considering this request.

Sincerely,

American Health Care Association  
America's Essential Hospitals  
Association for Community Affiliated Plans  
Catholic Health Association of the United States

Children's Hospital Association  
Easterseals  
The Jewish Federations of North America  
Medicaid Health Plans of America  
National Association of Community Health Centers  
National Association of Pediatric Nurse Practitioners  
National Association of Rural Health Clinics  
National Council for Behavioral Health  
National Health Care for the Homeless Council  
National Hispanic Medical Association