



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