

# Partnership for Medicaid Partnership for Medicaid

August 19, 2013

Kathleen Sebelius, Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Secretary Sebelius:

On behalf of The Partnership for Medicaid, we applaud the U.S. Department of Health & Human Services and the Centers for Medicare & Medicaid Services for releasing the final rule entitled *Medicaid and Children's Health Insurance Programs: Essential Health Benefits in Alternative Benefit Plans, Eligibility Notices, Fair Hearing and Appeal Processes, and Premiums and Cost Sharing; Exchanges: Eligibility and Enrollment*. The Partnership for Medicaid is a nonpartisan coalition made up of organizations representing the safety net: health care providers, health plans, along with counties and labor, amongst others, that seeks to preserve and improve the Medicaid program, raise awareness about the vital role played by the Medicaid program, and act as a unified voice to ensure that Medicaid continues its crucial role as a strong safety net for vulnerable Americans.

We were pleased to see that the Medicaid final rule affirms and highlights the importance of the Medicaid program as a safety net for an increasingly wide range of Americans. Specifically, the rule makes clear to all stakeholders that every individual who is eligible for Medicaid going forward will remain entitled to all of the rights and benefits afforded to them under the program, regardless of whether their state pursues an alternative coverage mechanism, stating that “under all premium assistance arrangements, Medicaid and CHIP-eligible individuals remain Medicaid or CHIP beneficiaries and continue to be entitled to all Medicaid/CHIP benefits and cost sharing protections.”<sup>1</sup> We applaud the Administration for providing this necessary clarity and strongly support this approach to Medicaid eligibility as new and innovative approaches to providing coverage are implemented across States.

We urge HHS and CMS to continue to maintain this approach to Medicaid eligibility and ensure that these individuals' rights and protections under Medicaid are upheld as the Administration considers Arkansas' 1115 Waiver Demonstration Proposal, as well as any additional proposals put forward by other States in the future. While innovative alternative approaches to Medicaid will likely become more prevalent, it is imperative that the Administration ensure Medicaid beneficiaries remain entitled to the rights, benefits, and protections that have been guaranteed to them in the Medicaid final rule and otherwise.

We look forward to working with the Administration and States towards a smooth and broad-based implementation of the Medicaid expansion across States and through innovative delivery

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<sup>1</sup> 78 Fed. Reg. 42,160, at 42,184.

models. As always, we are happy to discuss any of the above further and if there is any way that the Partnership can provide you with assistance as you consider Medicaid premium assistance proposals please do not hesitate to contact Shawn Gremminger, Co- Chair of the Partnership for Medicaid, at [sgremminger@essentialhospitals.org](mailto:sgremminger@essentialhospitals.org) or at 202-585-0112.

Sincerely,

America's Essential Hospitals  
American Congress of Obstetricians and Gynecologists  
Association for Community Affiliated Plans  
Association of Clinicians for the Underserved  
Catholic Health Association of the United States  
Easter Seals  
National Association of Community Health Centers  
National Association of Counties  
National Association of Pediatric Nurse Practitioners  
National Association of Rural Health Clinics  
National Council for Community Behavioral Healthcare  
National Health Care for the Homeless Council  
National Hispanic Medical Association  
National Rural Health Association

cc: Marilyn Tavenner, Administrator, Centers for Medicare and Medicaid Services  
Cindy Mann, Deputy Administrator / Director, Center for Medicaid and CHIP Services