



A Passionate Voice for Compassionate Care

December 19, 2019

Ms. Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Hubert H. Humphrey Building, Room 445-G
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

REF: CMS-2393-P

RE: Request for Extension of Comment Period for Medicaid Program; Medicaid Fiscal Accountability Regulation, 84 Fed. Reg. 63722 (November 18, 2019)

Dear Administrator Verma,

The Catholic Health Association of the United States, the national leadership organization of the Catholic health ministry representing more than 2,000 Catholic health care sponsors, systems, hospitals, long-term care facilities and related organizations across the continuum of care, writes to urge you to extend the comment period for the referenced proposed rule on Medicaid supplemental payments and financing.

Medicaid is a crucial element of our nation's safety net and provides essential health care services to working families, children, the elderly and those with disabilities, many of whom would be uninsured and without access to health care in the absence of a strong and vital Medicaid program. CHA supports efforts to strengthen and improve the Medicaid program and its ability to make sure those who rely on it get the health care they need.

However, we are very concerned about the impact this proposed rule could have on beneficiaries and states, and the limited time frame provided for soliciting input from stakeholders. The proposal is quite complex and potentially far-reaching and it is essential that interested parties have adequate time to analyze its provisions and their effects in order to provide meaningful comments for CMS' consideration. The current comment timeline is particularly challenging for states. Many state legislatures will not reconvene until mid-January leaving them with inadequate time to assess the potentially dramatic consequences of this rule for their state budgets and their residents.

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CHA urges you to extend the comment period on the proposed rule for at least 60 days, until March 17, 2020, to ensure that states and other stakeholders have sufficient time to provide CMS with the information it needs to make sound policy decisions.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Smith", written in a cursive style.

Lisa A. Smith
Vice President
Advocacy and Public Policy

Copy to: Calder Lynch, Acting Deputy Administrator