



ADVOCATES FOR
COMMUNITY
HEALTH

November 07, 2022

Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-2421-P
P.O. Box 8016
Baltimore, MD 21244-8016.

RE: Streamlining Medicaid, Children’s Health Insurance Program, and Basic Health Program Application, Eligibility Determination, Enrollment, and Renewal Processes (CMS-2421-P)

Dear Administrator Brooks-LaSure:

Advocates for Community Health (ACH) is comprised of leading federally qualified health centers (FQHCs) focused on health equity and innovation to drive health care systems, policies, and health programs. Our members serve over two million people and provide high-quality, comprehensive primary health care, mental health services, preventive care, and social services to patients most in need. We provide care to all patients regardless of their ability to pay.

According to the 2021 Uniform Data System ([UDS](#)) data, FQHCs serve over 30 million patients, of which over 8 million are children, 48% of patients are insured through Medicaid, and 20% are uninsured. Additionally, FQHCs support equitable primary care access with 63% patients identify as racial/ethnic minority, 24% of patients best served in a language other than English, and 90% of patients with a reported income less than or equal to 200% of the Federal Poverty Guidelines. We help Americans achieve Healthy People 2030 goals as well see the whole picture by screening for social risk factors.

ACH appreciates the opportunity to comment on this proposed rule and applaud the agency for addressing ways to improve Medicaid and CHIP enrollment processes and coverage. As CMS states in the proposed rule’s [fact sheet](#), “When people lose access to coverage, they lose access to vital health services.” This proposed rule is especially important as states begin COVID-19 Public Health Emergency (PHE) unwinding, and states return to normal operations while trying to maximize the number of patients to remain covered with health insurance after the PHE ends.

Overall, ACH supports the proposals in this rule which will increase enrollment and retention of eligible patients and reduce administrative burden on States and patients, particularly during the PHE unwinding transition period. We support CMS’s proposal to require states to utilize Medicare Part B Low-Income Subsidy applications to facilitate enrollment in the Medicare Savings Program, restrict states from requesting more information, especially if data is available electronically, and allow auto-roll of Supplemental Security Income and Medicare Part A-eligible beneficiaries in the Qualified Medicare

Beneficiary program. MSP allows Medicaid to provide coverage of Medicaid premiums and cost sharing which are often barriers for patients to seek or follow up with care. Additionally, this proposed rule expands citizenship and identity verification sources, checks other data sources for updated contact information upon receipt of returned mail, provides a simplified MAGI process to non-MAGI populations, eliminates CHIP waiting periods, eliminates premium lock-out periods in CHIP, and eliminates annual and lifetime limits for CHIP-enrolled children.

Other Recommendations

We appreciate the proposed changes in this rule. We recommend that any flexibilities around coverage enrollment and continuity include the Program of All-Inclusive Care for the Elderly (PACE), which serves a unique dual-eligible population, many of which seek care at our FQHCs.

Lastly, please consider ACH's additional recommendations to the CMS's request for information (RFI) entitled: "[Make Your Voice Heard: Promoting Efficient and Equity Within CMS Programs.](#)" The RFI focused on potential opportunities for improving policy, provider experiences, reducing provider and patient burdens, and addressing health inequities.

Conclusion

ACH thanks the administration for the opportunity to comment on this proposed rule. We look forward to working with the agency on ways to strengthen primary care. For questions regarding our comments, please contact me at apearskelly@advocatesforcommunityhealth.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amanda Kelly', with a stylized flourish at the end.

Amanda Kelly
Chief Executive Officer
Advocates for Community Health