



December 19, 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: Request for Extension of Comment Period/Deadline - Medicaid Fiscal Accountability Proposed Regulation; *Federal Register*, Vol. 84, No. 222, November 18, 2019 [CMS-2393-P]

Dear Administrator Verma:

The Medicaid Health Plans of America (MHPA) is the national trade association representing 94 member health plans that contract with state Medicaid agencies in 37 states plus the District of Columbia to provide comprehensive, high-quality health care to more than 23 million Medicaid beneficiaries in a coordinated and cost effective way.

On November 18th, the Centers for Medicare & Medicaid Services (CMS) released the proposed rule, "*Medicaid Program; Medicaid Fiscal Accountability Regulation.*" The proposed rule is intended to promote fiscal transparency and accountability in the Medicaid program.

MHPA supports CMS in its efforts to advance the goals of transparency and strengthening the overall fiscal integrity of the Medicaid program through this proposed rule. However, due to the broad scope of the proposal, we are concerned that without thoughtful and thorough analysis the potential for significant disruption to the current health care delivery system for all Medicaid beneficiaries regardless of whether they are served through fee-for-service or managed care is considerable.

We are also concerned about the limited timeframe available for stakeholders to offer meaningful comments given the complexity of these proposals. The 60-day comment period places the comment deadline on January 17, 2020. We note that the deadline occurs when most state legislatures will have just begun their legislative sessions. Due to the magnitude of the policy changes to the financing and administration of the Medicaid program, MHPA believes that state legislatures, and state Medicaid programs will need to be consulted and have the opportunity to provide thoughtful comments on the potential impact of these proposals on the Medicaid program in their state.

As a result of these concerns, we urge CMS to extend the comment period for this proposed rule for an additional 60 days, or no earlier than March 17, 2020. Thank you for your consideration.

Should you need any additional information or seek further clarification about our request, please feel free to contact me at sattanasio@mhpa.org.

Sincerely,

Shannon Attanasio

Shannon Attanasio
Vice President, Government Relations and Advocacy