



September 22, 2020

Mr. John Giles
Director, Division of Managed Care Policy
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Re: Transition Planning for Medicaid Post-Public Health Emergency

Dear Mr. Giles:

On behalf of the Medicaid Health Plans of America (MHPA), I would like to thank you and your colleagues from the Centers for Medicare and Medicaid Services (CMS) and the Center for Medicaid and CHIP Services (CMCS) for taking the time to both listen and engage in a productive dialogue with our member health plans on the August 27th call. We are delighted that the call is the first in a quarterly CMS/CMCS-MHPA series with the next call scheduled for November 19th.

As you know, MHPA works on behalf of over 100 member health plans, which serve approximately 25 million Medicaid enrollees in 38 states, or about one-third of all Medicaid beneficiaries in states with managed care delivery systems. MHPA's members include both for-profit and non-profit, national and regional, as well as single-state health plans that compete in the Medicaid market.

MHPA commends CMS/CMCS for the considerable flexibility extended to stakeholders across the Medicaid health care delivery safety net from the earliest stages of the COVID-19 pandemic to ensure that the health care needs of Medicaid beneficiaries continue to be met in an appropriate and timely manner. While end dates for temporary changes are tied to the legal authority that authorized the policy changes, a number of these changes are connected to the expiration of the public health emergency (PHE). MHPA has concerns that the sudden stoppage of policies in place for the duration of the PHE or changes made without appropriate notice and timing could have ramifications for the administration of the Medicaid program as well as potentially lead to confusion and uncertainty for Medicaid beneficiary access to care.

On the August 27th call, we shared our initial thoughts about several issues related to transitioning to policies after the expiration of the PHE. Attached you shall find a table that provides additional detail about the specific issues, key questions they raise, and recommendations. If you would like, we would be happy to include this as an agenda item on our quarterly call in November.

Once again, thank you for your ongoing efforts to provide for a smooth transition from these COVID-19 policies that consider the long-term sustainability of the Medicaid program, and most notably, work to prevent or minimize any potential disruption in the continued delivery of quality health care for Medicaid beneficiaries. We recognize the importance of working collaboratively to address the multitude of issues stemming from the pandemic and its impacts on our nation's most vulnerable communities. MHPA's member plans are well-positioned to help the Medicaid program remain a viable and sustainable approach to meeting public health needs.

We look forward to connecting with you on the November quarterly call. Should you have any questions in the meantime, please feel free to reach out to me directly via email at sattanasio@mhpa.org.

Sincerely,

Shannon Attanasio

Shannon Attanasio
Vice President, Government Relations and Advocacy
Medicaid Health Plans of America