

October 1, 2020

Alissa DeBoy, Director, Disabled and Elderly Health Program Group
Jennifer Bowdoin, Director, Division of Community Systems Transformation
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
Disabled and Elderly Health Programs Group
7500 Security Boulevard
Baltimore, MD 21244

Via email: HCBSMeasuresRFI@cms.hhs.gov

Re: Request for Information: Recommended Measure Set for Medicaid-Funded Home and Community-Based Services—Deadline Extension Request

Dear Ms. DeBoy and Ms. Bowdoin,

Thank you for the opportunity to provide comment on the Request for Information (RFI) on the Recommended Measure Set for Medicaid-Funded Home and Community-Based Services (HCBS). As the national trade associations representing health insurance providers at the state and federal level who serve hundreds of millions of Americans every day, we welcome the opportunity to respond to the questions posed in the RFI.

America's Health Insurance Plans, Association for Community Affiliated Plans, Blue Cross Blue Shield Association, Medicaid Health Plans of America, the National MLTSS Health Plan Association, and the SNP Alliance collectively represent the significant majority of health plans providing coverage to Medicaid beneficiaries with long term services and supports (LTSS) needs.¹ Our organizations are collectively reviewing the RFI with our members and seek to respond jointly. Our goal is to provide well-researched, consensus-based comments that represent the interests of the broader industry and the beneficiaries we serve.

As noted, the RFI is intended to inform CMS initiatives including the Medicaid and CHIP Scorecard, the Adult and Child Core Sets, and the future Medicaid and CHIP Quality Rating System. Given the importance of this RFI, both for the HCBS measures and future CMS work, we believe it is critical to invest significant time and resources in our response. However, given the ongoing demands of the pandemic on the health system, we are concerned that a 30-day comment will not allow for a thorough and thoughtful review and comment. ***For these reasons, we are requesting a 30-day extension of the comment deadline.***

Our organizations and our member health insurance providers stand ready to serve as a resource to CMS, during this comment period and beyond, as the agency continues its efforts to improve HCBS quality measures and improve outcomes for individuals utilizing HCBS. Please do not hesitate to contact us at any time with questions or for further information at:

Elizabeth "Liz" Goodman, America's Health Insurance Plans (AHIP), egoodman@ahip.org

¹ www.ahip.org; www.communityplans.net; www.achp.org; www.bcbsa.com; www.medicaidplans.org, www.mltss.org www.snpalliance.org

Christine Aguiar-Lynch, Association for Community Affiliated Plans, clynch@communityplans.net
Kris Haltmeyer, Blue Cross Blue Shield Association, kris.haltmeyer@bcbsa.com
Shannon Attanasio, Medicaid Health Plans of America, sattanasio@mhpa.org
Mary Kaschak, National MLTSS Health Plan Association, mkaschak@mltss.org
Cheryl Phillips, SNP Alliance, cphillips@snpalliance.org

Sincerely,

America's Health Insurance Plans
Association for Community Affiliated Plans
Blue Cross Blue Shield Association
Medicaid Health Plans of America
National MLTSS Health Plan Association
SNP Alliance