

December 17, 2020



IMPROVING LIVES by
DELIVERING SOLUTIONS for
QUALITY CARE

The Honorable Joseph R. Biden
President Elect of the United States of America
1401 Constitution Avenue, NW
Washington, DC 20230-0002

Dear President Elect Biden,

Our nation continues to face an unprecedented public health threat that is challenging health care delivery and capacity across the country. We appreciate President-elect Biden's strong and consistent messaging about the seriousness of the COVID-19 crisis and the necessary public health measures that should be taken in response.

The Medicaid program is the bedrock of the nation's health care system during times of difficulty. Medicaid is a countercyclical program, and during economic downturns more people turn to Medicaid for coverage. The number of people covered by Medicaid nationwide has been increasing as the impact of the recession caused by COVID-19 unfolds. Enrollment data from the Centers for Medicare & Medicaid Services (CMS) shows over 4.8 million new Medicaid and CHIP enrollments between February and July 2020 – a 6.9 percent increase since the Public Health Emergency (PHE) began in March 2020.i

The declaration of a federal PHE has been an essential tool allowing states, health plans, and clinicians essential flexibilities to adapt policies, prioritize operations in light of diminished staff capacity and increased enrollment, and respond to the evolving situation on the ground. For example, the PHE declaration has allowed states and providers to maintain ongoing access to care by rapidly expanding telehealth service availability and modifying payment rates to support vulnerable providers at risk of closure. The declaration of a PHE also has led to critical financial support via the 6.2 percentage point increase in the federal matching assistance percentage (FMAP) for state Medicaid programs. The Families First Coronavirus Response Act (FFCRA) provides this enhanced funding for states that meet the maintenance of eligibility (MOE) conditions for continued coverage for current enrollees as well as coverage of coronavirus testing and treatment through the end of the quarter in which the COVID PHE ends.

Looking ahead, we are hopeful that approval of effective and safe vaccines will put our nation on the path to recovery. We also recognize that widespread vaccination will take many months and the challenges for Medicaid enrollees, providers, and the program overall could persist for longer and continue to vary considerably by region. The current process is not transparent and fails to provide well-publicized markers or milestones to assist states with preparing for the "return to normal" and the expiration of



significant policy and financial flexibilities tied to the COVID PHE. As states and stakeholders in the Medicaid program, we want to work with federal policymakers to avoid an abrupt “cliff” in federal financing and flexibilities granted to states via the PHE declaration.

We are calling on President-elect Biden and the transition team to convene states and stakeholders to develop a set of publicly reported metrics or milestones that will inform future decisions around the COVID PHE declaration. Developing a consistent and public set of metrics allows states and Medicaid stakeholders to monitor trends, which could provide more predictability in planning for the future availability of Medicaid funding and flexibilities linked to the COVID PHE.

Our organizations are committed to ensuring ongoing access to high quality services for Medicaid enrollees. We believe that a collaborative process with the appropriate incoming Administration personnel involving states, plans, providers, and other experts could provide important insights to inform operational and financial planning as well as access to services for enrollees.

Thank you for your consideration of our request. We are available to serve as a resource to you on this and other issues of importance related to Medicaid.

Sincerely,

American Health Care Association/
National Center for Assisted Living

Association for Community
Affiliated Plans

America’s Health Insurance Plans

Medicaid Health Plans of
America

National Association of
Community Health Centers

National Association of
Medicaid Directors

National Council for Behavioral Health

ⁱ Medicaid and CHIP Enrollment Trends Snapshot through July 2020, Accessed December 10, 2020: [Medicaid and CHIP Enrollment Trends Snapshot through July 2020](#)