

February 17, 2022



IMPROVING LIVES by
DELIVERING SOLUTIONS for
QUALITY CARE



America's Health
Insurance Plans



The Honorable Charles Schumer
Majority Leader
U.S. Senate
S-221 Capitol
Washington, DC 20510

The Honorable Nancy Pelosi
Speaker
U.S. House of Representatives
H-222 Capitol
Washington, DC 20515

The Honorable Mitch McConnell
Minority Leader
U.S. Senate
S-203 Capitol
Washington, DC 20510

The Honorable Kevin McCarthy
Minority Leader
U.S. House of Representatives
H-2-4 Capitol
Washington, DC 20515

Dear Leader Schumer, Speaker Pelosi, Minority Leader McConnell, and
Minority Leader McCarthy:

The COVID-19 pandemic continues to challenge our country, and the discovery of new virus variants reminds us that there is significant work to be done before we overcome this once in a lifetime health care crisis. Our organizations look forward to continuing to work with you to ensure the 80 million people in America that rely on the Medicaid program have continued access to affordable, high quality health coverage and care.

Throughout this 2-year pandemic, the Medicaid program has provided essential health care coverage and services to more than 80 million low-income, vulnerable people that would otherwise not be able to afford insurance. However, we recognize that as the pandemic wears on, the strain placed on the Medicaid program has been building. While predictability in funding and enrollment is critical to operating state Medicaid programs, our organizations believe that any precipitous termination of the enhanced Federal Medical Assistance Percentage (FMAP) and continuous eligibility/Maintenance of Effort (MOE) provisions included in the Families First Coronavirus Response Act ([FFCRA](#)), which included significant safeguards to protect Medicaid beneficiaries during the COVID-19 pandemic, could lead to dangerous and unnecessary gaps in coverage and care.

As Congress and the administration begin to look toward unwinding these emergency programs, we believe that sufficient notice is needed for states, health plans and providers to collaboratively engage with Medicaid enrollees to make them aware of the issue and to assist them in avoiding dangerous and unnecessary gaps in coverage and care. As such, we respectfully request that Congress provide at least a 120-day lead time before unwinding the FMAP/MOE provisions of the FFCRA so that

enrollees have sufficient time to either re-establish their eligibility for Medicaid or determine their eligibility for subsidized coverage in the state or federally facilitated Marketplaces. We also note that the simultaneous processing of millions of eligibility determinations will prove operationally challenging for states, health plans, and providers who will see millions of individuals who otherwise remain eligible for Medicaid become uninsured unless sufficient time is allowed to avoid unnecessary lapses in coverage.

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

Sincerely,

American Health Care Association/
National Center for Assisted Living

Association for Community
Affiliated Plans

America's Health Insurance Plans

Children's Hospital Association

Medicaid Health Plans of
America

National Association of
Community Health Centers

National Association of
Medicaid Directors

National Council for
Mental Wellbeing