

February 28, 2020

Administrator Seema Verma
Centers of Medicare and Medicaid
Department of Health and Human Services
Washington, DC 20201

Dear Administrator Verma:

As leading national, state, and local organizations, representing health care consumers and patients, providers, and other stakeholders, **we are writing in strong opposition to recent guidance from CMS, *Healthy Adult Opportunity***, which allows states to fundamentally change the nature of their Medicaid programs. We urge the Administration to rescind this guidance, which could hurt millions of families that rely on Medicaid.

Medicaid is an essential source of coverage for over 70 million people. Medicaid's current state-federal partnership helps states provide quality health insurance to their residents – it ensures that children are able to get a healthy start in life, provides long-term care to seniors and people with disabilities, and vital health care for many adults including pregnant women. The current state-federal funding structure provides states and taxpayers a level of financial security, ensuring that as Medicaid spending fluctuates from year to year, the state and its taxpayers are not made solely responsible for covering any increased costs. Efforts to restructure or cut Medicaid would shift health care costs to the states, hurt local economies, and threaten care and coverage for millions.

The Administration's long-anticipated State Medicaid Director Letter, which was published on January 30, encourages states to adopt caps on their federal Medicaid funds voluntarily under a Medicaid section 1115 demonstration waiver. This arrangement involves major fiscal risk for states; the "flexibility" states will have is to cut services or take away coverage if and when they hit their new federal funding cap. Capping and restructuring Medicaid would create an awful choice for states in the event of increasing health care costs. Once that happens, the state will start rolling back coverage for kids, people with disabilities, and seniors and cost-effective optional benefits like dental care, without oversight.

Further, the Administration does not have jurisdiction to waive Medicaid's financing structure through the 1115 waiver process. Such a fundamental change to Medicaid's structure requires a change in statute and therefore an act of Congress. In 2017, when Congress considered federal funding caps, millions of people from around the country raised their voices in opposition, and lawmakers rejected the proposal on a bipartisan basis.

We urge the Administration to rescind this guidance that promises flexibility, but will surely lead to catastrophic implications for state budgets, and state Medicaid programs and the communities they serve. We implore you to reconsider this proposal, and protect the children, seniors, people with disabilities, women, parents, people of color, and working families that rely on Medicaid for health care.

Sincerely,

National Organizations

Families USA

1,000 Days

AARP

ACA Consumer Advocacy

ACCESS

ADAP Advocacy Association

AFL-CIO

African American Health Alliance

Aging Life Care Association
 AIDS United
 Allergy & Asthma Network
 American Academy of Pediatric Dentistry
 American Association of Public Health Dentistry
 American Association on Health and Disability
 American Federation of State, County & Municipal Employees
 American Federation of Teachers
 American Medical Student Association
 American Muslim Health Professionals
 American Physical Therapy Association
 American Public Health Association
 American Speech-Language-Hearing Association
 Americans for Democratic Action (ADA)
 Asian & Pacific Islander American Health Forum
 Association of Asian Pacific Community Health Organizations
 Association of Asthma Educators
 Association of School Business Officials International
 Asthma and Allergy Foundation of America
 Autism Society of America
 Autistic Self Advocacy Network
 Bazelon Center for Mental Health Law
 Bruderhof
 Campaign for America's Future
 Caring Across Generations
 Center for Law and Social Policy (CLASP)
 Center for Medicare Advocacy
 Center for Public Representation
 Center for the Study of Social Policy
 Child Welfare League of America
 Children's Defense Fund
 Children's HealthWatch
 Children's Hospital of Philadelphia
 Children's Trust Fund Alliance
 Coalition for Disability Health Equity
 Coalition of Labor Union Women
 Coalition on Human Needs
 Community Access National Network (CANN)
 Community Catalyst
 Congregation of Our Lady of the Good Shepherd, U.S. Provinces
 Cystic Fibrosis Foundation
 Disciples Center for Public Witness
 Easterseals
 Faith in Healthcare
 First Focus on Children
 Friends Committee on National Legislation
 Futures Without Violence
 Global Justice Institute, Metropolitan Community Churches
 Go2Foundation for Lung Cancer
 Health Care for American Now (HCAN)
 Health Over Profit for Everyone
 HealthConnect One
 Healthy Schools Campaign
 Hispanic Federation
 HIV Medicine Association
 Human Rights Campaign
 International Ventilator Users Network
 Jewish Federations of North America
 Justice in Aging
 Labor United for Class Struggle/Labor Today
 Lakeshore Foundation
 Little Lobbyists
 Lupus and Allied Diseases Association, Inc.
 Lutheran Services in America
 March for Moms
 Meals on Wheels America
 Medicare Rights Center
 Ministry Across Generations Team, Disciples Home Missions, Christian Church (Disciples of Christ)
 MomsRising
 Movement for Peoples' Democracy
 MoveOn
 NAACP
 NALLTCO (National Association of Local Long Term Care Ombudsman)
 NASTAD
 National Academy of Elder Law Attorneys
 National Adult Day Services Association (NADSA)
 National Advocacy Center of the Sisters of the Good Shepherd
 National Alliance for Caregiving
 National Alliance on Mental Illness
 National Association for Children's Behavioral Health
 National Association for Home Care and Hospice
 National Association of Area Agencies on Aging (n4a)
 National Association of Councils on Developmental Disabilities
 National Association of Pediatric Nurse Practitioners
 National Association of School Nurses
 National Association of Social Workers
 National Association of State Long-Term Care Ombudsman Programs (NASOP)
 National Center for Transgender Equality
 National Coalition for the Homeless
 National Coalition on Health Care
 National Consumer Voice for Quality Long-Term Care

National Council of Jewish Women
National Council on Independent Living
National Crittenton
National Equality Action Team
National Family Planning & Reproductive Health Association
National Latina Institute for Reproductive Health
National Multiple Sclerosis Society
National Partnership for Women & Families
National WIC Association
National Women's Health Network
National Working Positive Coalition
NETWORK Lobby for Catholic Social Justice
Network of Jewish Human Service Agencies
NMD United, Inc.
Nurse-Family Partnership
One Health Resource Company
Party of Communists USA
Pathways for Rare and Orphan Studies
Patient Advocate
Planned Parenthood Federation of America
Positive Women's Network-USA
Power to Decide
Prevent Blindness
Provincial Council Clerics of St. Viator
Public Advocacy for Kids
Public Citizen
Raising Women's Voices for the Health Care We Need
Redstone Global Center for Prevention and Wellness
RESULTS
Service Employees International Union
SIECUS: Sex Ed for Social Change
Sisters of Charity, BVM
Sisters of Mercy of the Americas Justice Team
Sisters of St. Joseph of Cluny USA/Canada
Social Security Works
Society for Public Health Education
Society of Saint Vincent de Paul
SocioEnergetics Foundation
The AIDS Institute
The Arc of the United States
The Augustinians
The Coelho Center for Disability Law, Policy and Innovation
The Global Justice Institute
The Leadership Conference on Civil and Human Rights
The National Alliance to Advance Adolescent Health
The National Center for Children in Poverty
Treatment Communities of America
Trust for America's Health
Union for Reform Judaism

United Church of Christ Justice and Witness Ministries
United Way Worldwide
URGE: Unite for Reproductive & Gender Equity
Voices for Progress
Women Creating Change
Women for Racial and Economic Equality
Young Invincibles
ZERO TO THREE

Alabama

AIDS Alabama
Alabama Academy of Pediatric Dentistry
Health Services Center, Inc.
Lighthouse Community Development Corp
National Association of Social Workers, Alabama Chapter

Alaska

Alaska Children's Trust
Bristol Bay Area Health Corporation
National Association of Social Workers, Alaska Chapter

Arizona

Children's Action Alliance
National Association of Social Workers, Arizona Chapter
West Valley Neighborhoods Coalition

Arkansas

Arkansas Advocates for Children and Families
Arkansas Community Institute
Arkansas Community Organizations
National Association of Social Workers, Arkansas Chapter

California

APLA Health
Asian Law Alliance
Brighter Beginnings
California Association of Food Banks
California Consortium of Addiction Programs & Professionals
California Coverage & Health Initiatives
California Health Advocates
California Pan-Ethnic Health Network
County Welfare Directors Association of California
Equality California
Jewish Family Service LA
Long Term Care Ombudsman Services of San Luis Obispo
County
Los Angeles LGBT Center
National Association of Social Workers, California Chapter
NextGen California

Orange County United Way
PathPoint
San Francisco AIDS Foundation
The Los Angeles Trust for Children's Health

Colorado

Center for Health Progress
Colorado Cross-Disability Coalition
Colorado School Medicaid Consortium
Disability Law Colorado
Hunger Free Colorado
National Association of Social Workers, Colorado Chapter

Connecticut

ArtBra New Haven
Ashford Senior Center
Collaborative Center for Justice
Connecticut Association of Area Agencies on Aging
Disability Rights Connecticut
National Association of Social Workers, Connecticut Chapter
Universal Health Care Foundation of Connecticut

Delaware

Delaware Ecumenical Council
National Association of Social Workers, Delaware Chapter

Florida

Catalyst Miami
Democratic Disability Caucus of Florida
Disability Rights Florida
Florida Agencies Serving the Blind
Florida Chapter of the American Academy of Pediatrics
Florida Impact to End Hunger
Florida Supportive Housing Coalition
Florida Voices for Health
National Association of Social Workers, Florida Chapter
The Support Coordination Association of Florida (SCAF)
The Family Cafe, Inc.

Georgia

Georgia Watch
Georgians for a Healthy Future
National Association of Social Workers, Georgia Chapter

Hawaii

Hawaii Disability Rights Center
National Association of Social Workers, Hawaii Chapter

Idaho

Idaho Interfaith Roundtable Against Hunger
National Association of Social Workers, Idaho Chapter

Illinois

AgeOptions
Champaign County Health Care Consumers
EverThrive Illinois
Health & Medicine Policy Research Group
Heartland Alliance
Illinois Association for Behavioral Health
Illinois Society for the Prevention of Blindness
LINC Inc.
National Association of Social Workers, Illinois Chapter
Protect Our Care Illinois
Shriver Center on Poverty Law
Thresholds

Indiana

Indiana Association of Area Agencies on Aging
Marion County Commission on Youth, Inc.
National Association of Social Workers, Indiana Chapter
Sisters of St. Francis, Clinton, Iowa
Tippecanoe County Council on Aging, Inc.

Iowa

Child and Family Policy Center
Franciscan Peace Center
National Association of Social Workers, Iowa Chapter

Kansas

Kansas Association of Area Agencies on Aging & Disabilities
National Association of Social Workers, Kansas Chapter

Kentucky

Jewish Family & Career Services of Louisville, Inc
Kentucky Equal Justice Center
Kentucky Protection and Advocacy
Kentucky Voices for Health
Lake Cumberland Area Development District
Lake Cumberland Area on Aging
National Association of Social Workers, Kentucky Chapter

Louisiana

CADA of Northwest Louisiana
Lawyer's Reentry Consulting
Louisiana Partnership for Children and Families
National Association of Social Workers, Louisiana Chapter

Maine

Maine Equal Justice
National Association of Social Workers, Maine Chapter
SeniorsPlus

Maryland

Galvanize Maryland
Green Earth Goods
Maryland Citizens' Health Initiative Education Fund Inc.
Maryland National Organization for Women
National Association of Social Workers, Maryland Chapter
Pemberton Pharmacy & Gift
Public Justice Center

Massachusetts

Advocates for Authenticity
Health Care For All Massachusetts
Massachusetts Home Care
National Association of Social Workers, Massachusetts Chapter
The Food Bank of Western Massachusetts

Michigan

Baldwin Family Health Care
Community Living Options
Health Emergency Lifeline Programs
Indivisible Livingston County MI
Michigan League for Public Policy
National Association of Social Workers, Michigan Chapter
OLHSA

Minnesota

Minnesota Academy of Pediatric Dentistry
Minnesota Association of Area Agencies on Aging
Minnesota Oral Health Coalition
National Association of Social Workers, Minnesota Chapter
TakeAction Minnesota

Mississippi

Fannie Lou Hamer Center For Change
Mississippi Human Services Coalition
Montgomery Citizens United for Prosperity (MCUP)
National Association of Social Workers, Mississippi Chapter

Missouri

Empower Missouri
Missouri Academy of Pediatric Dentistry
Missouri Budget Project
Missouri Health Care For All

National Association of Social Workers, Missouri Chapter
Places for People, Inc.

Montana

National Association of Social Workers, Montana Chapter
Summit Independent Living

Nebraska

National Association of Social Workers, Nebraska Chapter
Nebraska Appleseed

Nevada

Family TIES of Nevada, Inc
National Association of Social Workers, Nevada Chapter
Nevada Disability Advocacy & Law Center
Silver State Equality-Nevada

New Hampshire

National Association of Social Workers, New Hampshire Chapter

New Jersey

National Association of Social Workers, New Jersey Chapter
New Jersey Academy of Pediatric Dentistry
New Jersey Association of Mental Health and Addiction Agencies, Inc.
New Jersey Citizen Action
New Jersey Policy Perspective
New Jersey Tenants Organization
Newark Organization of Women

New Mexico

Health Action New Mexico
National Association of Social Workers, New Mexico Chapter

New York

Amida Care
Center for Disability Rights
Children's Defense Fund - New York
Commission on the Public's Health System
Disability Rights New York
Disabled in Action of Greater Syracuse Inc.
Gay Men's Health Crisis
Grand Street Settlement
Greater New York Labor Religion Coalition
National Association of Social Workers, New York State Chapter
New York Legal Assistance Group
R and W Livery Service, Latino Ambulette

The Children's Agenda
YWCA Elmira & the Twin Tiers
National Association of Social Workers, New York City
Chapter

North Carolina

Disability Rights North Carolina
Equality North Carolina
Goldsboro Pediatrics, PA
National Association of Social Workers, North Carolina
Chapter
NC Academy of Pediatric Dentistry
NC Child
Pisgah Legal Services

North Dakota

National Association of Social Workers, North Dakota Chapter

Ohio

Cleveland Nonviolence Network
Directions for Youth & Families
National Association of Social Workers, Ohio Chapter
Ohio Academy of Pediatric Dentistry
Ohio Alliance for Retired Americans Educational Fund
Ohio Association of Area Agencies on Aging
Ohio Consumers for Health Coverage
Ohio Nurses Association
Prevent Blindness, Ohio Affiliate

Oklahoma

National Association of Social Workers, Oklahoma Chapter
Oklahoma Policy Institute

Oregon

National Association of Social Workers, Oregon Chapter
Oregon Association of Area Agencies on Aging & Disabilities
TFP Therapeutic Services, Inc.

Pennsylvania

Consumer Health Coalition
HIAS Pennsylvania
JEVS Human Services
Just Harvest, A Center for Action Against Hunger
Liberty Resources, Inc
Mary House, Inc.
Maternity Care Coalition
National Association of Social Workers, Pennsylvania Chapter
Pantry of Plenty @ Sandy Hill Church
PathWays PA

Pennsylvania Council of Churches
Pennsylvania Health Access Network
Sisters of Saint Joseph of Chestnut Hill, Philadelphia, PA
The 99% Pennsylvania

Rhode Island

Disability Rights Rhode Island
Foster Forward
Mental Health Recovery Coalition of RI (MHRC-RI)
National Association of Social Workers, Rhode Island Chapter
Protect Our Healthcare Coalition Rhode Island
Rhode Island Coalition for the Homeless
Rhode Island KIDS COUNT
The Economic Progress Institute
The Oasis Wellness & Recovery Centers of RI

South Carolina

Benedictine University
National Association of Social Workers, South Carolina
Chapter
Protection and Advocacy for People with Disabilities South
Carolina
SC Appleseed Legal Justice Center
South Carolina Academy of Pediatric Dentists

South Dakota

National Association of Social Workers, South Dakota Chapter

Tennessee

A Voice For the Reduction of Poverty in Nashville and Beyond
Disability Rights Tennessee
Nashville Jewish Social Justice Roundtable.
National Association of Social Workers, Tennessee Chapter
Tennessee Academy of Pediatric Dentistry
Tennessee Health Care Campaign
Tennessee Justice Center

Texas

Center for Public Policy Priorities
Children's Defense Fund - Texas
Coalition of Texans with Disabilities
Feeding Texas
Food Bank of the Rio Grande Valley
Jay Andrews Consulting
McLennan County Hunger Coalition
NAMI Central Texas
NAMI Gulf Coast
NAMI North Texas
National Alliance on Mental Illness (NAMI) Texas

National Association of Social Workers, Texas Chapter
Prevent Blindness Texas
Texas Academy of Pediatric Dentistry
Texas Interfaith Center for Public Policy/Texas Impact
Texas Parent to Parent
Texas Pediatric Society, the Texas Chapter of the AAP
UUFHC

Utah

National Association of Social Workers, Utah Chapter
Utah Health Policy Project
Voices for Utah Children

Vermont

National Association of Social Workers, Vermont Chapter
Office of the Health Care Advocate, Vermont Legal Aid
Southern Vermont Area Health Education Center
Vermont Center for Independent Living
Vermont Coalition for Disability Rights

Virginia

8 Block
Central Virginia Health Services, Inc.
National Association of Social Workers, Virginia Chapter
Social Action Linking Together (SALT)
The New 21st Century Movement Association
Virginia Academy of Pediatric Dentistry
Virginia Coalition of Latino Organizations
Virginia Health Catalyst
Virginia Organizing
Virginia Poverty Law Center

Washington

Aging & Disability Services Advisory Council for Seattle and
King County
International Community Health Services

National Association of Social Workers, Washington Chapter
Northwest Harvest
Northwest Health Law Advocates
Toppenish Community Chest

Washington, D.C.

D.C. Hunger Solutions
National Association of Social Workers, Metro DC Chapter
SOME, Inc. (So Others Might Eat)
Whitman-Walker Health

West Virginia

National Association of Social Workers, West Virginia Chapter
Prevent Child Abuse WV / TEAM for WV Children
West Virginia Academy of Pediatric Dentistry
West Virginia Center on Budget and Policy
West Virginians for Affordable Healthcare

Wisconsin

Citizen Action of Wisconsin
Dominican Sisters of Sinsinawa Peace and Justice Office
End Domestic Abuse Wisconsin
Green Bay St. Vincent de Paul Voice of the Poor
Kids Forward
National Association of Social Workers, Wisconsin Chapter
Prevent Blindness Wisconsin
Wisconsin Association of Area Agencies on Aging
Wisconsin Faith Voices for Justice

Wyoming

National Association of Social Workers, Wyoming Chapter

U.S. Territories

National Association of Social Workers, Guam Chapter
National Association of Social Workers, Puerto Rico Chapter
National Association of Social Workers, Virgin Islands Chapter