



November 4, 2022

Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
P.O. Box 8016
Baltimore, MD 21244-8016

Submitted electronically via regulations.gov

Re: Streamlining the Medicaid, Children's Health Insurance Program, and Basic Health Program Application, Eligibility Determination, Enrollment, and Renewal Processes [CMS-2421-P]

Dear Administrator Brooks-LaSure:

The Academy of Managed Care Pharmacy (AMCP) thanks the Centers for Medicare & Medicaid Services (CMS) for the opportunity to provide comments in response to the proposed rule titled Streamlining the Medicaid, Children's Health Insurance Program, and Basic Health Program Application, Eligibility Determination, Enrollment, and Renewal Processes [CMS-2421-P], published in the Federal Register on September 7, 2022.

AMCP is the nation's leading professional association dedicated to increasing patient access to affordable medicines, improving health outcomes, and ensuring the wise use of healthcare dollars. Through evidence and value-based strategies and practices, AMCP's nearly 8,000 pharmacists, physicians, nurses, and other practitioners manage medication therapies for the 270 million Americans served by health plans, pharmacy benefit management firms, emerging care models, and government health programs.

AMCP supports the Administration's goal to simplify the processes for eligible individuals to enroll and retain eligibility in Medicaid, the Children's Health Insurance Program (CHIP), and the Basic Health Program. Medicaid and CHIP provide critical health coverage to more than 89 million Americans, including 40 million children, as well as pregnant women, people with disabilities, the working poor, and senior citizens.¹

AMCP is concerned that millions of people enroll in Medicaid and CHIP each year only to subsequently lose their coverage – despite often still being eligible – because of the cycle of

¹ <https://www.medicaid.gov/medicaid/program-information/medicaid-and-chip-enrollment-data/report-highlights/index.html>

enrollment and disenrollment referred to as “eligibility churn.”² Eligibility churn is caused by inefficient paperwork and other reporting requirements or temporary income fluctuations. Low-income individuals experiencing income volatility and the resulting loss of Medicaid eligibility do not typically transition to other forms of insurance, such as Marketplace or employer-sponsored coverage, and instead simply become uninsured. Studies show that communities of color are the most likely to experience income volatility each year.^{3, 4} We know that interruptions in coverage worsen health outcomes and lead to avoidable hospitalizations or emergency room care for mental health disorders, asthma, and diabetes. Coverage gaps also raise the average monthly cost of Medicaid and result in higher avoidable administrative costs for states, health care providers, and health plans.

A 2020 report found that, from 2016 through 2018, children living in states that have adopted continuous eligibility for children in Medicaid were much less likely to be uninsured or to have had a gap in coverage during the previous year.⁵ Simplified eligibility would increase stability in Medicaid and CHIP coverage, improving access to care. It will help health providers and plans more readily maintain continuity of care management, which is vital to keeping patients healthier. Most importantly, simplified eligibility requirements will lessen financial stress and offer steady access to needed care.

AMCP appreciates your consideration of the concerns outlined above and looks forward to continuing work on these issues with CMS. If you have any questions regarding AMCP's comments or would like further information, please contact Geni Tunstall at etunstall@amcp.org or (703) 705-9358.

Sincerely,



Susan A. Cantrell, RPh, CAE
Chief Executive Officer

² <https://www.macpac.gov/wp-content/uploads/2021/10/An-Updated-Look-at-Rates-of-Churn-and-Continuous-Coverage-in-Medicaid-and-CHIP.pdf>

³ https://aspe.hhs.gov/sites/default/files/migrated_legacy_files//199881/medicaid-churning-ib.pdf

⁴ <https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2017/03/how-income-volatility-interacts-with-american-families-financial-security>

⁵ <https://www.communityplans.net/wp-content/uploads/2020/06/GW-continuous-eligibility-paper.pdf>