

December 16, 2019

Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
Hubert H. Humphrey Building  
200 Independence Avenue, S.W., Room 445-G  
Washington, DC 20201

***RE: Request for Comment Period Extension: CMS–2393–P, Medicaid Program:  
Medicaid Fiscal Accountability Regulation (Vol. 84, No. 222), November 18, 2019.***

Dear Ms. Verma:

On behalf of our nearly 5,000 member hospitals, health systems and other health care organizations, our clinician partners – including more than 270,000 affiliated physicians, 2 million nurses and other caregivers – and the 43,000 health care leaders who belong to our professional membership groups, the American Hospital Association (AHA) requests a 60-day extension to the comment period for the Centers for Medicare & Medicaid Services' (CMS) proposed *Medicaid Fiscal Accountability Regulation*.

The AHA appreciates CMS's goal of strengthening the fiscal oversight and integrity of the Medicaid program, as stated in the proposed rule. However, given the scope and complexity of the proposed changes, we are concerned that the rule's comment period does not give state governments and stakeholders sufficient time to fully assess the rule's impact. Of particular concern is the potential impact these proposed changes could have on current and future state budgets. Many state legislatures will not be convening until mid-January, which leaves no time to consider or quantify the implications of these proposed changes on state Medicaid financing. Our own member hospitals are very concerned with the rippling effect this proposed rule could have for Medicaid beneficiary access to care. Extending the comment period will allow state policymakers and stakeholders more time to provide the agency with meaningful feedback.

The AHA urges CMS to extend the proposed rule comment deadline for at least an additional 60 days – to no earlier than March 17, 2020. Thank you for considering this



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request. Please contact me if you have questions, or feel free to have a member of your team contact Molly Collins Offner, director of policy, at [mcollins@aha.org](mailto:mcollins@aha.org) or (202) 626-2326.

Sincerely,

/s/

Thomas P. Nickels  
Executive Vice President