



December 8, 2023

The Honorable Xavier Becerra  
 Secretary  
 U.S. Department of Health and Human Services  
 200 Independence Ave, SW  
 Washington, DC 20201

**Re: Maryland HealthChoice 1115 Demonstration Amendment**

Dear Secretary Becerra:

Thank you for the opportunity to submit comments on the Maryland HealthChoice 1115 Demonstration Amendment Request.

The undersigned organizations represent millions of individuals facing serious, acute and chronic health conditions. We have a unique perspective on what individuals and families need to prevent disease, cure illness and manage chronic health conditions. The diversity of our organizations and the populations we serve enable us to draw upon a wealth of knowledge and expertise that is an invaluable resource regarding any decisions affecting the Medicaid program and the people that it serves. We urge the Centers for Medicare and Medicaid Services (CMS) to make the best use of the recommendations, knowledge and experience our organizations offer here.

Our organizations are committed to helping the people we represent navigate the unwinding of the continuous coverage requirements to ensure that those who are currently enrolled in Medicaid maintain their coverage if eligible or transition to other forms of quality, affordable care. To that end, we

appreciate Maryland's work to adopt effective redetermination policies that minimize the administrative burden on patients. Our organizations urge CMS to approve Maryland's request to permanently implement Express Lane Eligibility (ELE) and offer the following comments on the Maryland HealthChoice 1115 Demonstration Amendment Request.

Our organizations support Maryland's proposal to permanently implement ELE for adults and continue to automatically renew Medicaid eligibility using Supplemental Nutrition Assistance Program-verified income. This process will ease administrative burdens on the state and reduce churn, improving continuity of care for patients. Individuals who have disruptions in coverage during a year are more likely to delay care, refill prescriptions less often, and have more emergency department visits.<sup>1</sup> ELE has been an effective tool during the unwinding of the continuous coverage provisions, and our organizations support ELE for adults as a way to continue to reduce negative health outcomes in the state. This policy will also complement the state plan amendment Maryland is submitting to implement ELE for children.

Our organizations support Maryland's efforts to improve access to quality and affordable health coverage. We urge CMS to approve the state's request to permanently implement Express Lane Eligibility for adults. Thank you for the opportunity to provide comments.

Sincerely,

American Heart Association  
American Lung Association  
Arthritis Foundation  
Asthma and Allergy Foundation of America  
*CancerCare*  
Child Neurology Foundation  
Crohn's & Colitis Foundation  
Cystic Fibrosis Foundation  
Epilepsy Foundation America  
Hemophilia Federation of America  
Immune Deficiency Foundation  
Lupus Foundation of America  
March of Dimes  
National Kidney Foundation  
National Multiple Sclerosis Society  
National Organization for Rare Disorders  
National Patient Advocate Foundation  
National Psoriasis Foundation  
Susan G. Komen  
The Leukemia & Lymphoma Society  
WomenHeart

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<sup>1</sup>Sugar S, Peters C, De Lew N, Sommers BD. Medicaid Churning and Continuity of Care: Evidence and Policy Considerations Before and After the Covid-19 Pandemic. Assistant Secretary for Planning and Evaluation, Office of Healthy Policy. April 12, 2021. Available at: <https://aspe.hhs.gov/sites/default/files/private/pdf/265366/medicaid-churning-ib.pdf>