



Maryland  
Hospital Association

November 7, 2022

The Honorable Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare & Medicaid Services  
Submitted via <https://www.regulations.gov>

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

Dear Administrator Brooks-LaSure:

On behalf of the Maryland Hospital Association's (MHA) 60 member hospitals and health systems, we appreciate the opportunity to comment on the proposed rule, Streamlining the Medicaid, Children's Health Insurance Program (CHIP), and Basic Health Program Application, Eligibility Determination, Enrollment, and Renewal Processes. The proposed rule intends to improve access and coverage for people eligible for Medicaid and CHIP by removing enrollment barriers, streamlining eligibility determinations, and protecting beneficiaries against loss of coverage.

The proposed rule includes several measures intended to facilitate coverage. For example, the proposed rule would require states to apply the same timeliness standard for renewal of enrollment as they do for initial applications. States would be required to allow sufficient time for beneficiaries to provide the documentation needed to stay enrolled. The proposed rule would also require states to conduct renewals no more than once every 12 months for beneficiaries whose eligibility is based on being 65 or older, blind or disabled.

MHA shares the proposed rule's goals. We and our members support the proposed rule's efforts to facilitate enrollment, minimize disruption of coverage, reduce temporary loss of coverage due to changed circumstances, and ease administrative burden for state Medicaid programs.

Thank you again for this opportunity to comment. We appreciate that CMS is advancing policies that will improve the well-being of Marylanders.

Sincerely,

Bob Atlas  
President & CEO