



March 14, 2020

Seema Verma
Administrator
Centers for Medicare and Medicaid Services
200 Independence Ave S.W.
Washington, D.C. 20201

Re: Section 1915(c), Appendix K Waivers

Dear Administrator Verma:

On behalf of the Partnership for Medicaid Home-Based Care, we would like to thank you for your leadership on the COVID-19 Task Force and for working on behalf of the American people during this national public health emergency.

We write today to urge the Centers for Medicare and Medicaid Services to use its authority to grant blanket approvals to states submitting Section 1915(c), Appendix K waivers. The blanket waiver would give states the immediate flexibility needed to eliminate requirements that are inconsistent with the prevention of community spread and achievement of social distancing.

Since its founding in 2015, PMHC has been dedicated to its mission of advancing the delivery of high-quality, cost-effective Medicaid home-based care and services. Our members bring to this important quest their experience as home care providers, associations, managed care organizations, and technology providers. While such a diverse membership is somewhat unique, our members have come together due to a shared commitment to support legislative and regulatory efforts that improve the quality, accessibility, and integrity of home and community-based care and services (HCBS) in Medicaid.

In the event of additional and significant community spread of COVID-19, Medicaid home care providers are expected to have significant demands placed on them not only for caring for current Medicaid HCBS eligible individuals, but the demand of an increasing number of individuals eligible to live and be cared for in a community-based setting.

The safety and well-being of our direct care workforce is paramount. Allowing states the flexibility granted under Section 1915(c), Appendix K waivers, HCBS providers will have the resources necessary to meet anticipated increased demand in staffing while simultaneously addressing the potential reduction of available staff due to COVID-19 exposure. Such a reduction in staff could place considerable strains on the care-delivery system.

Thank you for consideration of this request. Our members stand ready to assist in your efforts to ensure the health and safety of the American people.

Sincerely,

A handwritten signature in black ink, appearing to read 'David J. Totaro'.

David J. Totaro
Chairman