

February 28, 2020

Administrator Seema Verma  
Centers of Medicare and Medicaid  
Department of Health and Human Services  
Washington, DC 20201

Dear Administrator Verma:

As leading national, state, and local organizations, representing health care consumers and patients, providers, and other stakeholders, **we are writing in strong opposition to recent guidance from CMS, *Healthy Adult Opportunity***, which allows states to fundamentally change the nature of their Medicaid programs. We urge the Administration to rescind this guidance, which could hurt millions of families that rely on Medicaid.

Medicaid is an essential source of coverage for over 70 million people. Medicaid's current state-federal partnership helps states provide quality health insurance to their residents – it ensures that children are able to get a healthy start in life, provides long-term care to seniors and people with disabilities, and vital health care for many adults including pregnant women. The current state-federal funding structure provides states and taxpayers a level of financial security, ensuring that as Medicaid spending fluctuates from year to year, the state and its taxpayers are not made solely responsible for covering any increased costs. Efforts to restructure or cut Medicaid would shift health care costs to the states, hurt local economies, and threaten care and coverage for millions.

The Administration's long-anticipated State Medicaid Director Letter, which was published on January 30, encourages states to adopt caps on their federal Medicaid funds voluntarily under a Medicaid section 1115 demonstration waiver. This arrangement involves major fiscal risk for states; the "flexibility" states will have is to cut services or take away coverage if and when they hit their new federal funding cap. Capping and restructuring Medicaid would create an awful choice for states in the event of increasing health care costs. Once that happens, the state will start rolling back coverage for kids, people with disabilities, and seniors and cost-effective optional benefits like dental care, without oversight.

Further, the Administration does not have jurisdiction to waive Medicaid's financing structure through the 1115 waiver process. Such a fundamental change to Medicaid's structure requires a change in statute and therefore an act of Congress. In 2017, when Congress considered federal funding caps, millions of people from around the country raised their voices in opposition, and lawmakers rejected the proposal on a bipartisan basis.

We urge the Administration to rescind this guidance that promises flexibility, but will surely lead to catastrophic implications for state budgets, and state Medicaid programs and the communities they serve. We implore you to reconsider this proposal, and protect the children, seniors, people with disabilities, women, parents, people of color, and working families that rely on Medicaid for health care.

Sincerely,

**National Organizations**

Families USA

1,000 Days

AARP

ACA Consumer Advocacy

ACCESS

ADAP Advocacy Association

AFL-CIO

African American Health Alliance

Aging Life Care Association  
 AIDS United  
 Allergy & Asthma Network  
 American Academy of Pediatric Dentistry  
 American Association of Public Health Dentistry  
 American Association on Health and Disability  
 American Federation of State, County & Municipal  
     Employees  
 American Federation of Teachers  
 American Medical Student Association  
 American Muslim Health Professionals  
 American Physical Therapy Association  
 American Public Health Association  
 American Speech-Language-Hearing Association  
 Americans for Democratic Action (ADA)  
 Asian & Pacific Islander American Health Forum  
 Association of Asian Pacific Community Health Organizations  
 Association of Asthma Educators  
 Association of School Business Officials International  
 Asthma and Allergy Foundation of America  
 Autism Society of America  
 Autistic Self Advocacy Network  
 Bazelon Center for Mental Health Law  
 Bruderhof  
 Campaign for America's Future  
 Caring Across Generations  
 Center for Law and Social Policy (CLASP)  
 Center for Medicare Advocacy  
 Center for Public Representation  
 Center for the Study of Social Policy  
 Child Welfare League of America  
 Children's Defense Fund  
 Children's HealthWatch  
 Children's Hospital of Philadelphia  
 Children's Trust Fund Alliance  
 Coalition for Disability Health Equity  
 Coalition of Labor Union Women  
 Coalition on Human Needs  
 Community Access National Network (CANN)  
 Community Catalyst  
 Congregation of Our Lady of the Good Shepherd, U.S.  
     Provinces  
 Cystic Fibrosis Foundation  
 Disciples Center for Public Witness  
 Easterseals  
 Faith in Healthcare  
 First Focus on Children  
 Friends Committee on National Legislation  
 Futures Without Violence  
 Global Justice Institute, Metropolitan Community Churches  
 Go2Foundation for Lung Cancer  
 Health Care for American Now (HCAN)  
 Health Over Profit for Everyone  
 HealthConnect One  
 Healthy Schools Campaign  
 Hispanic Federation  
 HIV Medicine Association  
 Human Rights Campaign  
 International Ventilator Users Network  
 Jewish Federations of North America  
 Justice in Aging  
 Labor United for Class Struggle/Labor Today  
 Lakeshore Foundation  
 Little Lobbyists  
 Lupus and Allied Diseases Association, Inc.  
 Lutheran Services in America  
 March for Moms  
 Meals on Wheels America  
 Medicare Rights Center  
 Ministry Across Generations Team, Disciples Home Missions,  
     Christian Church (Disciples of Christ)  
 MomsRising  
 Movement for Peoples' Democracy  
 MoveOn  
 NAACP  
 NALLTCO (National Association of Local Long Term Care  
     Ombudsman)  
 NASTAD  
 National Academy of Elder Law Attorneys  
 National Adult Day Services Association (NADSA)  
 National Advocacy Center of the Sisters of the Good  
     Shepherd  
 National Alliance for Caregiving  
 National Alliance on Mental Illness  
 National Association for Children's Behavioral Health  
 National Association for Home Care and Hospice  
 National Association of Area Agencies on Aging (n4a)  
 National Association of Councils on Developmental  
     Disabilities  
 National Association of Pediatric Nurse Practitioners  
 National Association of School Nurses  
 National Association of Social Workers  
 National Association of State Long-Term Care Ombudsman  
     Programs (NASOP)  
 National Center for Transgender Equality  
 National Coalition for the Homeless  
 National Coalition on Health Care  
 National Consumer Voice for Quality Long-Term Care

National Council of Jewish Women  
National Council on Independent Living  
National Crittenton  
National Equality Action Team  
National Family Planning & Reproductive Health Association  
National Latina Institute for Reproductive Health  
National Multiple Sclerosis Society  
National Partnership for Women & Families  
National WIC Association  
National Women's Health Network  
National Working Positive Coalition  
NETWORK Lobby for Catholic Social Justice  
Network of Jewish Human Service Agencies  
NMD United, Inc.  
Nurse-Family Partnership  
One Health Resource Company  
Party of Communists USA  
Pathways for Rare and Orphan Studies  
Patient Advocate  
Planned Parenthood Federation of America  
Positive Women's Network-USA  
Power to Decide  
Prevent Blindness  
Provincial Council Clerics of St. Viator  
Public Advocacy for Kids  
Public Citizen  
Raising Women's Voices for the Health Care We Need  
Redstone Global Center for Prevention and Wellness  
RESULTS  
Service Employees International Union  
SIECUS: Sex Ed for Social Change  
Sisters of Charity, BVM  
Sisters of Mercy of the Americas Justice Team  
Sisters of St. Joseph of Cluny USA/Canada  
Social Security Works  
Society for Public Health Education  
Society of Saint Vincent de Paul  
SocioEnergetics Foundation  
The AIDS Institute  
The Arc of the United States  
The Augustinians  
The Coelho Center for Disability Law, Policy and Innovation  
The Global Justice Institute  
The Leadership Conference on Civil and Human Rights  
The National Alliance to Advance Adolescent Health  
The National Center for Children in Poverty  
Treatment Communities of America  
Trust for America's Health  
Union for Reform Judaism

United Church of Christ Justice and Witness Ministries  
United Way Worldwide  
URGE: Unite for Reproductive & Gender Equity  
Voices for Progress  
Women Creating Change  
Women for Racial and Economic Equality  
Young Invincibles  
ZERO TO THREE

#### **Alabama**

AIDS Alabama  
Alabama Academy of Pediatric Dentistry  
Health Services Center, Inc.  
Lighthouse Community Development Corp  
National Association of Social Workers, Alabama Chapter

#### **Alaska**

Alaska Children's Trust  
Bristol Bay Area Health Corporation  
National Association of Social Workers, Alaska Chapter

#### **Arizona**

Children's Action Alliance  
National Association of Social Workers, Arizona Chapter  
West Valley Neighborhoods Coalition

#### **Arkansas**

Arkansas Advocates for Children and Families  
Arkansas Community Institute  
Arkansas Community Organizations  
National Association of Social Workers, Arkansas Chapter

#### **California**

APLA Health  
Asian Law Alliance  
Brighter Beginnings  
California Association of Food Banks  
California Consortium of Addiction Programs & Professionals  
California Coverage & Health Initiatives  
California Health Advocates  
California Pan-Ethnic Health Network  
County Welfare Directors Association of California  
Equality California  
Jewish Family Service LA  
Long Term Care Ombudsman Services of San Luis Obispo  
County  
Los Angeles LGBT Center  
National Association of Social Workers, California Chapter  
NextGen California

Orange County United Way  
PathPoint  
San Francisco AIDS Foundation  
The Los Angeles Trust for Children's Health

**Colorado**

Center for Health Progress  
Colorado Cross-Disability Coalition  
Colorado School Medicaid Consortium  
Disability Law Colorado  
Hunger Free Colorado  
National Association of Social Workers, Colorado Chapter

**Connecticut**

ArtBra New Haven  
Ashford Senior Center  
Collaborative Center for Justice  
Connecticut Association of Area Agencies on Aging  
Disability Rights Connecticut  
National Association of Social Workers, Connecticut Chapter  
Universal Health Care Foundation of Connecticut

**Delaware**

Delaware Ecumenical Council  
National Association of Social Workers, Delaware Chapter

**Florida**

Catalyst Miami  
Democratic Disability Caucus of Florida  
Disability Rights Florida  
Florida Agencies Serving the Blind  
Florida Chapter of the American Academy of Pediatrics  
Florida Impact to End Hunger  
Florida Supportive Housing Coalition  
Florida Voices for Health  
National Association of Social Workers, Florida Chapter  
The Support Coordination Association of Florida (SCAF)  
The Family Cafe, Inc.

**Georgia**

Georgia Watch  
Georgians for a Healthy Future  
National Association of Social Workers, Georgia Chapter

**Hawaii**

Hawaii Disability Rights Center  
National Association of Social Workers, Hawaii Chapter

**Idaho**

Idaho Interfaith Roundtable Against Hunger  
National Association of Social Workers, Idaho Chapter

**Illinois**

AgeOptions  
Champaign County Health Care Consumers  
EverThrive Illinois  
Health & Medicine Policy Research Group  
Heartland Alliance  
Illinois Association for Behavioral Health  
Illinois Society for the Prevention of Blindness  
LINC Inc.  
National Association of Social Workers, Illinois Chapter  
Protect Our Care Illinois  
Shriver Center on Poverty Law  
Thresholds

**Indiana**

Indiana Association of Area Agencies on Aging  
Marion County Commission on Youth, Inc.  
National Association of Social Workers, Indiana Chapter  
Sisters of St. Francis, Clinton, Iowa  
Tippecanoe County Council on Aging, Inc.

**Iowa**

Child and Family Policy Center  
Franciscan Peace Center  
National Association of Social Workers, Iowa Chapter

**Kansas**

Kansas Association of Area Agencies on Aging & Disabilities  
National Association of Social Workers, Kansas Chapter

**Kentucky**

Jewish Family & Career Services of Louisville, Inc  
Kentucky Equal Justice Center  
Kentucky Protection and Advocacy  
Kentucky Voices for Health  
Lake Cumberland Area Development District  
Lake Cumberland Area on Aging  
National Association of Social Workers, Kentucky Chapter

**Louisiana**

CADA of Northwest Louisiana  
Lawyer's Reentry Consulting  
Louisiana Partnership for Children and Families  
National Association of Social Workers, Louisiana Chapter

**Maine**

Maine Equal Justice  
National Association of Social Workers, Maine Chapter  
SeniorsPlus

**Maryland**

Galvanize Maryland  
Green Earth Goods  
Maryland Citizens' Health Initiative Education Fund Inc.  
Maryland National Organization for Women  
National Association of Social Workers, Maryland Chapter  
Pemberton Pharmacy & Gift  
Public Justice Center

**Massachusetts**

Advocates for Authenticity  
Health Care For All Massachusetts  
Massachusetts Home Care  
National Association of Social Workers, Massachusetts Chapter  
The Food Bank of Western Massachusetts

**Michigan**

Baldwin Family Health Care  
Community Living Options  
Health Emergency Lifeline Programs  
Indivisible Livingston County MI  
Michigan League for Public Policy  
National Association of Social Workers, Michigan Chapter  
OLHSA

**Minnesota**

Minnesota Academy of Pediatric Dentistry  
Minnesota Association of Area Agencies on Aging  
Minnesota Oral Health Coalition  
National Association of Social Workers, Minnesota Chapter  
TakeAction Minnesota

**Mississippi**

Fannie Lou Hamer Center For Change  
Mississippi Human Services Coalition  
Montgomery Citizens United for Prosperity (MCUP)  
National Association of Social Workers, Mississippi Chapter

**Missouri**

Empower Missouri  
Missouri Academy of Pediatric Dentistry  
Missouri Budget Project  
Missouri Health Care For All

National Association of Social Workers, Missouri Chapter  
Places for People, Inc.

**Montana**

National Association of Social Workers, Montana Chapter  
Summit Independent Living

**Nebraska**

National Association of Social Workers, Nebraska Chapter  
Nebraska Appleseed

**Nevada**

Family TIES of Nevada, Inc  
National Association of Social Workers, Nevada Chapter  
Nevada Disability Advocacy & Law Center  
Silver State Equality-Nevada

**New Hampshire**

National Association of Social Workers, New Hampshire Chapter

**New Jersey**

National Association of Social Workers, New Jersey Chapter  
New Jersey Academy of Pediatric Dentistry  
New Jersey Association of Mental Health and Addiction Agencies, Inc.  
New Jersey Citizen Action  
New Jersey Policy Perspective  
New Jersey Tenants Organization  
Newark Organization of Women

**New Mexico**

Health Action New Mexico  
National Association of Social Workers, New Mexico Chapter

**New York**

Amida Care  
Center for Disability Rights  
Children's Defense Fund - New York  
Commission on the Public's Health System  
Disability Rights New York  
Disabled in Action of Greater Syracuse Inc.  
Gay Men's Health Crisis  
Grand Street Settlement  
Greater New York Labor Religion Coalition  
National Association of Social Workers, New York State Chapter  
New York Legal Assistance Group  
R and W Livery Service, Latino Ambulette

The Children's Agenda  
YWCA Elmira & the Twin Tiers  
National Association of Social Workers, New York City  
Chapter

#### **North Carolina**

Disability Rights North Carolina  
Equality North Carolina  
Goldsboro Pediatrics, PA  
National Association of Social Workers, North Carolina  
Chapter  
NC Academy of Pediatric Dentistry  
NC Child  
Pisgah Legal Services

#### **North Dakota**

National Association of Social Workers, North Dakota Chapter

#### **Ohio**

Cleveland Nonviolence Network  
Directions for Youth & Families  
National Association of Social Workers, Ohio Chapter  
Ohio Academy of Pediatric Dentistry  
Ohio Alliance for Retired Americans Educational Fund  
Ohio Association of Area Agencies on Aging  
Ohio Consumers for Health Coverage  
Ohio Nurses Association  
Prevent Blindness, Ohio Affiliate

#### **Oklahoma**

National Association of Social Workers, Oklahoma Chapter  
Oklahoma Policy Institute

#### **Oregon**

National Association of Social Workers, Oregon Chapter  
Oregon Association of Area Agencies on Aging & Disabilities  
TFP Therapeutic Services, Inc.

#### **Pennsylvania**

Consumer Health Coalition  
HIAS Pennsylvania  
JEVS Human Services  
Just Harvest, A Center for Action Against Hunger  
Liberty Resources, Inc  
Mary House, Inc.  
Maternity Care Coalition  
National Association of Social Workers, Pennsylvania Chapter  
Pantry of Plenty @ Sandy Hill Church  
PathWays PA

Pennsylvania Council of Churches  
Pennsylvania Health Access Network  
Sisters of Saint Joseph of Chestnut Hill, Philadelphia, PA  
The 99% Pennsylvania

#### **Rhode Island**

Disability Rights Rhode Island  
Foster Forward  
Mental Health Recovery Coalition of RI (MHRC-RI)  
National Association of Social Workers, Rhode Island Chapter  
Protect Our Healthcare Coalition Rhode Island  
Rhode Island Coalition for the Homeless  
Rhode Island KIDS COUNT  
The Economic Progress Institute  
The Oasis Wellness & Recovery Centers of RI

#### **South Carolina**

Benedictine University  
National Association of Social Workers, South Carolina  
Chapter  
Protection and Advocacy for People with Disabilities South  
Carolina  
SC Appleseed Legal Justice Center  
South Carolina Academy of Pediatric Dentists

#### **South Dakota**

National Association of Social Workers, South Dakota Chapter

#### **Tennessee**

A Voice For the Reduction of Poverty in Nashville and Beyond  
Disability Rights Tennessee  
Nashville Jewish Social Justice Roundtable.  
National Association of Social Workers, Tennessee Chapter  
Tennessee Academy of Pediatric Dentistry  
Tennessee Health Care Campaign  
Tennessee Justice Center

#### **Texas**

Center for Public Policy Priorities  
Children's Defense Fund - Texas  
Coalition of Texans with Disabilities  
Feeding Texas  
Food Bank of the Rio Grande Valley  
Jay Andrews Consulting  
McLennan County Hunger Coalition  
NAMI Central Texas  
NAMI Gulf Coast  
NAMI North Texas  
National Alliance on Mental Illness (NAMI) Texas

National Association of Social Workers, Texas Chapter  
Prevent Blindness Texas  
Texas Academy of Pediatric Dentistry  
Texas Interfaith Center for Public Policy/Texas Impact  
Texas Parent to Parent  
Texas Pediatric Society, the Texas Chapter of the AAP  
UUFHC

**Utah**

National Association of Social Workers, Utah Chapter  
Utah Health Policy Project  
Voices for Utah Children

**Vermont**

National Association of Social Workers, Vermont Chapter  
Office of the Health Care Advocate, Vermont Legal Aid  
Southern Vermont Area Health Education Center  
Vermont Center for Independent Living  
Vermont Coalition for Disability Rights

**Virginia**

8 Block  
Central Virginia Health Services, Inc.  
National Association of Social Workers, Virginia Chapter  
Social Action Linking Together (SALT)  
The New 21st Century Movement Association  
Virginia Academy of Pediatric Dentistry  
Virginia Coalition of Latino Organizations  
Virginia Health Catalyst  
Virginia Organizing  
Virginia Poverty Law Center

**Washington**

Aging & Disability Services Advisory Council for Seattle and  
King County  
International Community Health Services

National Association of Social Workers, Washington Chapter  
Northwest Harvest  
Northwest Health Law Advocates  
Toppenish Community Chest

**Washington, D.C.**

D.C. Hunger Solutions  
National Association of Social Workers, Metro DC Chapter  
SOME, Inc. (So Others Might Eat)  
Whitman-Walker Health

**West Virginia**

National Association of Social Workers, West Virginia Chapter  
Prevent Child Abuse WV / TEAM for WV Children  
West Virginia Academy of Pediatric Dentistry  
West Virginia Center on Budget and Policy  
West Virginians for Affordable Healthcare

**Wisconsin**

Citizen Action of Wisconsin  
Dominican Sisters of Sinsinawa Peace and Justice Office  
End Domestic Abuse Wisconsin  
Green Bay St. Vincent de Paul Voice of the Poor  
Kids Forward  
National Association of Social Workers, Wisconsin Chapter  
Prevent Blindness Wisconsin  
Wisconsin Association of Area Agencies on Aging  
Wisconsin Faith Voices for Justice

**Wyoming**

National Association of Social Workers, Wyoming Chapter

**U.S. Territories**

National Association of Social Workers, Guam Chapter  
National Association of Social Workers, Puerto Rico Chapter  
National Association of Social Workers, Virgin Islands Chapter