



January 31, 2020

RE: CMS-2393-P

Dear Administrator Verma,

On behalf of the Massachusetts Senior Care Association (MSCA), representing the Commonwealth's nursing facilities that care for and employ more than 200,000 individuals, we are writing to urge CMS to delay implementation of the Medicaid Fiscal Accountability Rule until the CMS has time to collect detailed data from the states and assess state impacts using a Technical Expert Panel.

Nursing facilities provide a core safety net service to frail elders and disabled individuals who can no longer be cared for safely at home. Two-thirds of nursing facility residents have their care paid for by the state's Medicaid program, MassHealth. Therefore, nursing facilities depend on MassHealth for adequate funding to ensure quality resident care.

In Massachusetts, nursing homes employ 73,000 staff and contribute \$4 billion into the state's economy. As such, it is important to note that providers not only deliver services that improve the health of those in their communities, but they are also employers, taxpayers, and consumers themselves. Every dollar spent on Medicaid has a ripple effect that stimulates additional spending for goods and services, supporting local economies and strengthening state economies.

Medicaid plays a crucial role in supporting the nation's health care system and accounts for a significant portion of revenues for health care providers, including hospitals, physicians, clinics, and nursing centers, as well as home and personal care services.

MSCA is concerned that the broad, sweeping changes that CMS is proposing will ultimately serve as draconian cuts to state Medicaid budgets, and will ultimately have a negative impact on beneficiaries and their ability to access needed care and services covered under the program. In Massachusetts, the estimated budgetary impact is \$1.4 billion. Our state Medicaid program is currently struggling to adequately fund nursing home care.

In short, this proposed rule is especially concerning for providers that care for a majority Medicaid-covered population, particularly nursing homes. Federal policy decisions that impact funding for Medicaid will have a direct impact on the resources available to facilities to provide quality care to beneficiaries. Because Medicaid is a large payor of nursing facility services, it is critical that payment policies support high-quality, efficient care.

We urge CMS to delay implementation of the Medicaid Fiscal Accountability Rule until the CMS has time to collect detailed data from the states and assess state impacts using a Technical Expert Panel.

Sincerely,

A handwritten signature in black ink, appearing to read "Tara M. Gregorio". The signature is fluid and cursive, with the first name being the most prominent.

Tara M. Gregorio
President