



July 13, 2020

Alex Azar
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue S.W.
Washington, DC 20201

Dear Secretary Azar,

On behalf of the nation's Medicaid Directors, NAMD is writing to request:

- An extension of at least two months for Medicaid providers to apply for receipt of funding from the Provider Relief Fund (PRF), with the extension beginning on the date of resolution of outstanding issues with the current process identified by states, and
- Data on the number of applications submitted by state, by provider type, and by number of applications started but not completed, in order to support the most targeted and effective state-level outreach possible on the fund.

NAMD appreciates HHS's engagement with states since the Medicaid provider application process began in June. However, we are concerned that certain unresolved challenges have limited provider applications and may leave out providers HHS intends to support if the current July 20 deadline is not extended.

HHS announced on June 9 that approximately \$15 billion in PRF funds would be distributed to Medicaid providers who applied for such funds by July 20. HHS has issued sets of Frequently Asked Questions, held three webinars, and developed a fact sheet to assist providers in completing this process. NAMD appreciates this work and the opportunities to frequently communicate with HHS to share information and enhance communications to Medicaid providers on accessing PRF funds.

In the weeks since HHS's initial announcement, NAMD's members identified several issues that may inhibit broad Medicaid provider participation in the PRF process. These include:

- Challenges with providers who were eligible for a general distribution but did not complete its application process prior to the June 3 deadline, and are thus ineligible for participation in the Medicaid distribution,
- Confusion about HHS's interpretation of statutory requirements of treating COVID-19 positive or potential COVID-19 patients,
- Provider misunderstandings that receipt of Paycheck Protection Program funds or other Congressionally appropriated COVID-19 relief excludes them from the PRF, and
- Technical challenges with the portal, which include but are not limited to:
 - Being unable to progress without a license number which many certified Medicaid providers may not have,

- Providers needing help understanding what information to input in specific fields within the portal,
- Call center staff not being able to provide timely resolution to provider questions, and
- Inability for providers to consistently obtain passwords necessary to advance in the application process.

HHS addressed some of these issues in subsequent guidance and communications to providers. Other issues, such as the licensure number issue, have not yet been resolved. NAMD is concerned that with the July 20 deadline quickly approaching, many providers who are continuing to experience technical challenges with the portal or who are impacted by these unresolved issues will not be able to complete the application process in time, despite being eligible for relief.

For these reasons, we respectfully request HHS extend the Medicaid provider application period by at least two months following implementation of solutions to these issues. This step will ensure that as many eligible providers as possible are able to complete an application and receive critical financial relief. Additionally, NAMD requests that HHS make available to our members data on the number of applications submitted by state, by provider type, and by number of applications started but not completed. This information will allow states to conduct targeted outreach and education to eligible providers who appear less aware of or engaged in the application process.

NAMD and our members stand ready to assist HHS in providing additional information to effectuate this change.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Salo". The signature is fluid and cursive, with a long horizontal stroke at the end.

Matt Salo
Executive Director