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Cynthia Mann, JD
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Dear Ms. Mann,

I wanted to thank you for speaking at NACHC's Policy and Issues Forum in March. We appreciate your time and support for health centers and your presentation was right on target as both Medicaid expansion and reimbursement have been a primary focus of activity and concern for health centers.

I am also writing to request your assistance on an issue that we spoke about briefly at the conference: the delay Medicaid prospective payment system (PPS) payments to FQHCs in a number of states. This is occurring as a result of those states' requirements that the health center demonstrate that its respective sites have been certified by CMS as a Medicare FQHC site. The initial cause for these delays stems from unacceptable and unwarranted delays of six months or more by Medicare Administrative Contractors (MAC) and/or CMS Medicare Regional Offices in processing and certifying health center sites as Medicare FQHC sites—often despite the health center's having timely filed all the necessary documents with these parties. We have brought this issue to the attention of the Center for Medicare leadership to try to minimize, and eventually eliminate, these delays.

According to a recent survey, 26 State Medicaid agencies have unnecessarily compounded and exacerbated the payment delays faced by health centers by requiring that the center provide proof of Medicare FQHC site certification as a condition of the state approving or certifying that site as eligible for Medicaid PPS reimbursement. There appears to be no legal basis for states to establish such a requirement and, as you might expect, it has greater adverse repercussions for health centers than the Medicare requirement as the health center Medicaid populations are substantially larger than most centers Medicare populations.

NACHC has also raised this to the attention of CMS Medicare in hopes to resolve the Medicare certification delays. We believe the solution to the Medicaid delays, however, to be much simpler to resolve, as CMS need only inform the states that they cannot have a policy that conditions Medicaid FQHC PPS reimbursement on the FQHC being able to demonstrate that its site has been certified as an FQHC by Medicare. We are anxious to work with you and your staff on this issue.

Thank you for attention to this critical issue. Please do not hesitate to contact me should you need additional information. We look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Schwartz". The signature is fluid and cursive, with the first name "Roger" and last name "Schwartz" clearly distinguishable.

Roger Schwartz

Associate Vice President of Executive Branch Liaison

cc: Jim Macrae, M.A., M.P.P., Associate Administrator for Primary Health Care, Health Resources and Services Administration