



May 8, 2020

To: Members of the Medical Services Board
From: Lila Cummings, Manager, Public Policy, Colorado Hospital Association
Re: Support of Multiple Emergency Rules

Dear Members of the Medical Services Board,

On behalf of over 100 hospitals and health systems in Colorado, the Colorado Hospital Association (CHA) writes in support of six emergency rules presented to the Medical Services Board (MSB) today. CHA commends the Department of Health Care Policy and Financing's (HCPF) leadership and response to COVID-19 through reasonable changes to policies that will increase access for Medicaid members and ease administrative burden for providers and hospitals.

COVID-19 has uprooted the lives of every patient, health care worker and hospital across Colorado. While the number of COVID-19 cases in Colorado slowly declines, the levels of uncertainty regarding the impacts of relaxed social distancing, availability of personal protective equipment and other supplies and the financial stability of health care providers remain. CHA appreciates the impact each of these emergency rules will have:

- **MSB 20-05-01-A** – streamlining provider enrollment processes, including temporary removal of background checks, site visits and application fee payments, will ease administrative burden for hospitals.
- **MSB 20-04-30-A** – expanding the use of EMT services will allow patients to safely seek care in the most appropriate location, which can help prevent overwhelming hospital emergency departments and can expedite appropriately discharging patients to lower levels of care.
- **MSB 20-04-30-B** – allowing use of NEMT services to alternative care sites, similar to the EMT emergency rule, will allow patients to safely seek care in most appropriate setting, which can help prevent overwhelming hospital emergency departments and can expedite appropriately discharging patients to lower levels of care.
- **MSB 20-04-29-A** – aligning with federal guidance by allowing Medicaid members to remain eligible during the public health emergency and allowing for self-attestation, among other changes, will ensure access to care.
- **CHP 20-04-29-B** – aligning with federal guidance by allowing Child Health Plan Plus (CHP+) members to maintain enrollment when they are unable to return to the state and waiving enrollment fees, among other changes, will ensure access to care.
- **MSB 20-04-27-A** – suspending the requirement to recertify the Certificate of Medical Necessity for long-term oxygen ensures access to medically necessary services for a population who is at risk during this public health emergency.

CHA thanks HCPF for their ongoing partnership and support for our patients, health care workers and Colorado's hospitals during this critical time. CHA appreciates MSB members' consideration of these emergency rules. Thank you for the opportunity to provide comment and for your attention to this work.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lila Cummings', is written over a white background.

Lila Cummings
Manager, Public Policy
Colorado Hospital Association