

May 17, 2022

The Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 12th Street SW
Washington, DC 20554
[Submitted electronically]

Dear Chairwoman Rosenworcel,

As organizations that share a strong commitment to the health of our nation's children, we write to express our full support for the petition that the Secretary of the Department of Health and Human Services (HHS), jointly with the Administrator for the Centers for Medicare & Medicaid Services (CMS), submitted to your agency regarding the need for state Medicaid agencies, Medicaid managed care plans, and other Medicaid contractors to send limited communications to enrollees via text messages and automated, pre-recorded calls. This option could help mitigate catastrophic coverage losses for children and families at the end of the Public Health Emergency (PHE).

Nearly 54% of our nation's children (40 million) currently rely on Medicaid and CHIP coverage, including children with special health care needs and those from low-income families. Medicaid also provides comprehensive prenatal care to pregnant women, enabling millions of pregnant women to have healthy pregnancies and thereby helping millions of children get a healthy start. Unlike many private health insurance plans, Medicaid guarantees specific benefits designed especially for children. Medicaid's Early and Periodic Screening, Diagnostic and Treatment (EPSDT) benefits are the definitive standard of pediatric care, covering an array of services like developmental, dental, vision and hearing screenings, and allowing health problems to be diagnosed and treated appropriately and as early as possible. Children enrolled in Medicaid are more likely to get medical check-ups, attend more days at school, graduate, and enter the workforce than their uninsured peers.

Under a provision in the Families First Coronavirus Response Act (P.L. 116-127), Congress protected coverage in Medicaid by deeming enrollees as continuously eligible throughout the duration of the PHE. As the Secretary has indicated, the PHE may soon come to an end. When it does, states will have 14 months to make redeterminations for all current enrollees, a process CMS is referring to as "the Unwinding" period. Subsequently, many enrollees will be required to respond to renewal forms and submit updated information or documentation to prove they still qualify for the program.

While some current beneficiaries may lose Medicaid coverage because they are not eligible for ongoing coverage after the end of the PHE, others who continue to be eligible could lose coverage due to the simple fact that states lack up-to-date contact information for them or because they did not receive their notice or were unable to respond to renewal requests for information. A recent analysis from the Kaiser Family Foundation estimates that between 5.3-14.2 million people are at risk of losing coverage during this period. Considering that children have seen the largest Medicaid eligibility increase since the start of the pandemic, they are likely

to see disproportionate coverage losses during the Unwinding period.¹ A separate analysis from the Georgetown Center for Children and Families estimates that at least 6.7 million children are likely to lose their Medicaid coverage and are at considerable risk for becoming uninsured after the PHE ends.²

The pandemic is now more than two years old, and many children and families enrolled in Medicaid have moved to a different address during this period. Historically, states have communicated with enrollees by sending them materials in the mail. However, children have faced significant housing insecurity during the pandemic.³ More than one in five renters living with children reported they were not caught up on last month's rent, and one in three of these households expect to be evicted in the next two months.⁴ For the beneficiaries who have not updated their mailing address after moving, states will be unable to supply enrollees with these much-needed documents via the mail. This puts millions of children and families at risk of losing coverage even though they remain eligible, which threatens their access to vital services like vaccinations, developmental screenings, and treatment for acute and chronic illnesses.

Allowing states, health plans, and Medicaid contractors to remind enrollees of the need to update their contact information and/or remind enrollees to respond to renewal requests through text messages and pre-recorded calls is a cost-effective and timely way to reach enrollees who can't be found by mail. As a result, this option could help mitigate these catastrophic coverage losses by reminding enrollees to update their contact information, return their renewal forms, and follow up with the Marketplace if their enrollment needs to transition.

Children's coverage is particularly susceptible to changes in federal and state policies. When the colossal eligibility redetermination process begins, the outcomes will vary enormously for children depending on where they live and how well their states handle the transition. As such, we support the petition from HHS and CMS to allow state agencies and other partners to use text messages and automated calls to enrollees as states resume regular operations at the end of the COVID-19 Public Health Emergency.

Thank you for the opportunity to comment on this matter. If our organizations can be of any further assistance, please do not hesitate to contact Stephanie Glier, Director, Federal Advocacy at the American Academy of Pediatrics at sglier@aap.org.

Sincerely,

¹ Williams, E., Rudowitz, R., & Corallo, B. (2022, May 10). *Fiscal and enrollment implications of Medicaid continuous coverage requirement during and after the phe ends*. KFF. Retrieved May 11, 2022, from <https://www.kff.org/medicaid/issue-brief/fiscal-and-enrollment-implications-of-medicaid-continuous-coverage-requirement-during-and-after-the-phe-ends/>

² Alker, J., & Brooks, T. (2022, February 23). *Millions of children may lose Medicaid: What can be done to help prevent them from becoming uninsured?* Center For Children and Families. Retrieved May 11, 2022, from <https://ccf.georgetown.edu/2022/02/17/millions-of-children-may-lose-medicaid-what-can-be-done-to-help-prevent-them-from-becoming-uninsured/>

³ Todres J, Meeler L. Confronting Housing Insecurity—A Key to Getting Kids Back to School. *JAMA Pediatr.* 2021;175(9):889–890. doi:10.1001/jamapediatrics.2021.1085

⁴ Week 44 Household Pulse Survey, Phase 3.4, March 30–April 11. US Census Bureau. Retrieved May 13, 2022 from <https://www.census.gov/data/tables/2022/demo/hhp/hhp44.html>

American Academy of Pediatrics
Children's Hospital Association
Family Voices
First Focus on Children
Georgetown Center for Children and Families
March of Dimes
National Association of Pediatric Nurse Practitioners