



June 11, 2015

Victoria Wachino, Director
Department of Health & Human Services
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop S2-26-12
Baltimore, MD 21233-1850

VIA ELECTRONIC MAIL

Dear Ms. Wachino:

The Florida Association of Counties (FAC) would like to offer the following comments on the Low Income Pool (LIP) Amendment to Florida's 1115 Managed Medical Assistance Waiver (Project Number 11-W-002064), submitted to CMS by the Florida Agency for Healthcare Administration (AHCA) on May 26, 2015.

AHCA's proposal would reduce payments to Florida hospitals by over \$214 million and is dependent on local communities providing the same level of funding. Therefore, FAC's primary concern is that the proposal creates a disincentive for many of the entities, namely counties and local hospital taxing districts, who voluntarily contribute to the program through intergovernmental transfers (IGTs). Specifically, the proposed model relies on IGTs to raise funds for the state match; however, the proposed distribution to hospitals would dramatically reduce payments to providers in those counties that contribute the most funds, including, for example, the public hospital systems in Broward County, Hillsborough County and Miami-Dade County. This potentially creates a situation in which those entities reduce or opt out of their IGT contributions due to the lack of return, which could disrupt the program as a whole and ultimately negatively impact access to health care for low income Floridians throughout the state. In short, the unintended consequences of this proposal would likely reach hospitals throughout the state, including those in my home county of Escambia, which like many others, rely in part on the federal match that is generated by the contributions of our sister counties.

Due to the proposed redistribution of funds and the negative consequences that will ensue in those counties whose voluntary contributions are necessary to sustain the program in the long-term, FAC has serious concerns about the success of the proposal. To that end, FAC looks forward to continued discussions on finding a replacement program that is equitable and ensures that Florida's most vulnerable people have continued access to quality health care.

Sincerely,

Grover C. Robinson, IV
President

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ESCAMBIA

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BROWARD

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IMMEDIATE PAST PRESIDENT
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CHRISTOPHER L. HOLLEY
EXECUTIVE DIRECTOR





Cc: Commissioner Barbara Sharief, Broward County
Commissioner Kathy Bryant, Marion County
Commissioner Warren Yeager, Gulf County
Commissioner Bryan Desloge, Leon County
Chris Holley, Executive Director

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