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March 11, 2016

Victoria Wachino
Director for the Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services

Dear Ms. Wachino:

Health Care for All New York (HCFANY) is a statewide coalition of over 170 organizations seeking to secure affordable, quality health care for all New Yorkers. We write to urge the Centers for Medicare and Medicaid Services (CMS) to approve federal matching funding for the New York State Clinic Uncompensated Care Pool (UCP). Loss of this funding would reduce access to high quality health care to the most vulnerable of New York's health care consumers.

New York State safety net clinics, including federally qualified health centers (FQHCs), are facing an immediate financial crisis as a result of this loss of indigent care funding. For example, nearly 25 percent of FQHCs that receive these funds currently have operational deficits because they did not receive the 2015 federal match.

New York's UCP is comprised of state funding matched with equal federal funding. Since 2011, the Pool has totaled \$108 million – once \$54.4 million each in state and federal funding. The UCP provides vital assistance to community-based health providers, off-setting the overall cost of caring for the uninsured. On average, 18 percent of patients seen at FQHCs are uninsured, 125 percent higher than New York's average uninsurance rate of 8 percent. However, at some health centers, more than half of patients are uninsured. The Pool provides a larger proportion of funding to health centers that provide more care to uninsured patients.

The authorization for the federal match expired at the end of 2014. Although DOH has asked for the match to be reauthorized and extended, CMS has not yet approved this request. This has resulted in a \$54.4 million shortfall for community-based providers, an amount that will continue to grow without CMS action.

Health Care For All New York
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We are concerned that further inaction will hurt patients. Without this funding, patients will find their clinics have had to reduce staff and limit clinic hours. Uninsured and low-income patients already face barriers to health care, contributing to racial and ethnic health disparities. As such, this funding loss would exacerbate existing health care inequities.

The loss of primary care capacity would also undermine other efforts in which New York and CMS are currently engaged: to expand access to primary care services, reduce unnecessary hospitalizations, and improve health outcomes for all New Yorkers.

We appreciate your attention to this critical issue and we urge you to make a timely decision on the New York State Clinic Uncompensated Care Pool (UCP) and ongoing matching funding through 2017.

If you have any questions, please contact Carrie Tracy at ctracy@cssny.org or 212-614-5401.

Very truly yours,

Elisabeth Benjamin, MSPH, JD
Vice President of Health Initiatives
Community Service Society of New York