



May 9, 2023

Chiquita Brooks-LaSure, Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244-1850

Re:CMS-9894-P; Clarifying Eligibility for a Qualified Health Plan through an Exchange, Advance Payments of the Premium Tax Credit, Cost-Sharing Reductions, a Basic Health Program, and for Some Medicaid and Children's Health Insurance Programs

Submitted electronically via <http://www.regulations.gov>

Dear Administrator Brooks-LaSure,

Trinity Health appreciates the opportunity to comment on policies set forth in CMS-9894-P. Our comments and recommendations reflect a strong interest in public policies that support better health, better care and lower costs to ensure affordable, high quality, and people-centered care for all.

Trinity Health is one of the largest not-for-profit, Catholic health care systems in the nation. It is a family of 123,000 colleagues and more than 26,000 physicians and clinicians caring for diverse communities across 26 states. Nationally recognized for care and experience, the Trinity Health system includes 88 hospitals, 135 continuing care locations, the second largest PACE program in the country, 136 urgent care locations and many other health and well-being services. Trinity Health has 15 medical groups with 1,324 primary care providers and 4,193 specialty care providers. Based in Livonia, Michigan, its annual operating revenue is \$21.5 billion with \$1.4 billion returned to its communities in the form of charity care and other community benefit programs.

Approaches to improve the country's health system and reduce the cost of care for individuals should put people at the center of every behavior, action, and decision. Trinity Health believes access to affordable, quality care is a basic human right and we support policies that create such access.

Extending Health Care Access to Individuals in Deferred Action for Childhood Arrivals Program

Trinity Health fully supports the proposed rule that would extend Medicaid and Children's Health Insurance Program coverage to qualified individuals in the Deferred Action for Childhood Arrivals (DACA) program in states that cover legally residing immigrant children and pregnant women. In addition, we also support allowing DACA recipients to purchase coverage through the Health Insurance Marketplace; qualify for Marketplace subsidies based on income; and apply for the Basic Health Program in states that participate, currently just Minnesota and New York.

We urge CMS to finalize the proposed rule, which would extend coverage to an estimated 129,000 DACA recipients, as estimated by CMS.

Conclusion

We appreciate CMS's ongoing efforts to improve access to health programs. If you have any questions on our comments, please feel free to contact me at jennifer.nading@trinity-health.org.

Sincerely,

/s/

Jennifer Nading
Director, Medicare and Medicaid Policy and Regulatory Affairs
Trinity Health