



June 28, 2021

Basundhara Raychaudhuri
Waiver Coordinator, Policy Development Support
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Boulevard
Austin, TX 78751

[TX Medicaid Waivers@hhsc.state.tx.us](mailto:TX_Medicaid_Waivers@hhsc.state.tx.us)

Re: Comments to HHSC Section 1115 Waiver Extension Request through 2030

Dear Ms. Raychaudhuri:

On May 28, 2021, the Texas Health and Human Services Commission (HHSC) published its request to extend and amend the Section 1115 Waiver (Extension Request) for public comment. Through the Extension Request, HHSC proposes the same terms and conditions agreed to and approved by the Centers for Medicare and Medicaid Services (CMS) on January 15, 2021. CHRISTUS Health fully supports the Extension Request. The Extension Request will create financial stability for Texas Medicaid providers during the ongoing public health emergency and beyond by:

- Extending the Waiver through September 2030, which includes the Uncompensated Care (UC) pool that serves as a critical source of financial security for both hospital and non-hospital providers.
- Rebasing the UC pool twice during the extension to more accurately reflect the growing uncompensated charity care costs incurred by hospitals.
- Providing a glide path for HHSC and CMS to collaborate and implement directed payment programs, including CHIRP and TIPPS, that will facilitate the transition of the Delivery System Reform Incentive Payment (DSRIP) program into a sustainable, Medicaid managed care delivery system.
- Rebasing without-Waiver per member per month (PMPM) costs on FFY 2022 data that is inclusive (either directly or through adjustments) of new and increased directed payment programs.

CHRISTUS Health appreciates the opportunity to provide feedback on this critically important matter and is happy to answer any questions that you may have.

Respectfully,

A handwritten signature in black ink, appearing to read "RS", written over a faint circular stamp.

Randy Safady
Executive Vice President and Chief Financial Officer
CHRISTUS Health