



Calder Lynch  
Director  
Center for Medicaid and CHIP Services  
Centers for Medicare and Medicaid Services  
7500 Security Blvd. Baltimore, MD 21244

March 30, 2020

Dear Director Lynch,

Thank you for the tremendous work that the Centers are doing on addressing the COVID-19 outbreak. We have been impressed to see how quickly the Centers are reviewing and approving urgent 1135 waivers and Appendix K requests. This is important and vital work and we are deeply appreciative. We are writing you today to highlight an issue we have not yet seen addressed and believe is paramount to making sure that key recipients of the Medicaid program, specifically people with disabilities, are protected during the outbreak and maintain the essential supports they need in the aftermath of it.

As you know, the American Network of Community Options and Resources (ANCOR) represents over 1,600 providers of home and community-based services and intermediate care facility services for people with intellectual and developmental disabilities (I/DD). It has come to our attention that due to numerous state and local "shelter in place" orders as well as the national 15 days to slow the spread guidance to self-isolate, many of the people our members serve are not fully spending their Social Security payments. Typically, this would not be an issue as they require this funding for everyday transactions, however the spending is down because of business closures as well as out of fear that they may need it due to unforeseen circumstances of COVID-19.

Our concern for these individuals, many with significant disabilities, is that they will not maintain the asset limit requirements of SSI and therefore disrupt their Medicaid eligibility and the life-sustaining supports and services that they depend on daily. We therefore respectfully request flexibility from the Center for Medicaid to provide a blanket waiver or other flexibility that assets exceeding existing limits during the public health emergency will not be considered in eligibility assessment for Medicaid services for the duration of this crisis. Our hope is that SSA will also reflect flexibility within their authority to also preserve the funding that these individuals rely on to sustain their livelihood.

Please let us know if you have further questions and thank you for your public service and commitment during this emergency period.

Sincerely,

*Shannon McCracken*

Shannon McCracken

VP for Government Relations, ANCOR

Cc:

Seema Verma, Administrator, CMS

Andrew Saul, Commissioner, SSA