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VIA ELECTRONIC SUBMISSION

Centers for Medicare & Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Attention: CMS-10891
Room C4-26-05
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Re: CMS-10891 Medicaid Program; Medicare Savings Program Application and Eligibility Determinations

The Medicare Rights Center (Medicare Rights) appreciates this opportunity to comment on **CMS-10891—Medicaid Program; Medicare Savings Program Application and Eligibility Determinations** comment request. Medicare Rights is a national, nonprofit organization that works to ensure access to affordable and equitable health care for older adults and people with disabilities through counseling and advocacy, educational programs, and public policy initiatives. Each year, Medicare Rights provides services and resources to over three million people with Medicare, family caregivers, and professionals.

Our comments are informed by our work helping thousands of people with Medicare apply for Medicare Savings Programs (MSPs). As the [Centers for Medicare & Medicaid Services \(CMS\) has documented](#), MSP processes are notoriously confusing for applicants, as well as many advocates and eligibility workers.

For this reason, we applaud efforts to reduce friction in the system whenever possible in an attempt to get more people into MSPs where they can better access affordable, high-quality health care. We appreciate this update to the MSP application template and find that it is a significant improvement on the previous design.

Qualified Medicare Beneficiary (QMB): *the state pays your Medicare Part A and/or Part B premiums and cost sharing (deductibles, co-insurance and copays). If you qualify for QMB, you automatically qualify for Extra Help to pay your Medicare Part D drug coverage costs.*

We believe it may be helpful to include information about how the QMB program can help people enroll in Part A (if they have Part B) or B (if they have Part A).

Specified Low-Income Medicare Beneficiary (SLMB): the state pays your Medicare Part B premiums, and you automatically qualify for Extra Help to pay your Medicare Part D drug coverage costs.

Qualifying Individual (QI): the state pays your Medicare Part B premiums, and you automatically qualify for Extra Help to pay your Medicare Part D drug coverage costs.

As with the above, we believe it would be helpful to include information about how the SLMB or QI programs can help people enroll in Part B (if they have Part A).

Household Members

Include your spouse who is living in the same household and relatives living in the same household who are dependent on either you or your spouse for at least half of their financial support. If you need more room to write, attach additional pages.

We recommend the application be as streamlined and free of extraneous requirements as possible to reduce unnecessary effort for applicants and advocates. It is our understanding that all states calculate household sizes for a maximum of two—the applicant and their spouse, if applicable. If so, the additional collection of household members that would not be relevant to the application should be removed.

We understand that this might be included to prepare for future state actions to align MSP and low-income subsidy (LIS) eligibility criteria, as the LIS does take into account larger household sizes. But we recommend the current application be as streamlined as possible until those LIS-to-MSP links are established.

Conclusion

Thank you again for the opportunity to provide comment. For additional information, please contact Lindsey Copeland, Federal Policy Director at LCopeland@medicarerights.org or 202-637-0961 and Julie Carter, Counsel for Federal Policy at JCarter@medicarerights.org or 202-637-0962.

Sincerely,



Fred Riccardi
President
Medicare Rights Center