



July 15, 2020

The Honorable Roger Williams  
United States House of Representatives  
Washington DC 20515

The Honorable Eddie Bernice Johnson  
United States House of Representatives  
Washington DC 20515

Dear Representatives Williams and Johnson:

I am writing on behalf of the Safety-Net Association of Pennsylvania, a coalition of private safety-net hospitals that provide 40 percent of Medicaid-covered hospital inpatient care in our state, to convey our support for your new bill, the MFAR Transparency Act. HR 7606 would delay implementation of the Medicaid fiscal accountability regulation until the Government Accountability Office analyzes the proposed rule's potential financial impact on individual states and identifies what is needed to enhance Medicaid transparency, and even then, it would only permit implementation of MFAR with specific authorization from Congress.

SNAP believes many provisions in the MFAR rule would hurt low-income Americans, hurt state Medicaid programs, and hurt providers located in low-income communities. In particular, we oppose the rule's attempt to inappropriately regulate how the states finance their Medicaid programs. We are especially concerned that the MFAR rule would enable federal regulators to reject state Medicaid funding mechanisms that are explicitly permitted under federal law and have been approved in the past by the very federal regulators the regulation would now empower to reject them. This could jeopardize the financial foundation of many states' Medicaid programs, including Pennsylvania's – and in so doing, jeopardize access to care for some of the more than 2.8 million Pennsylvanians currently enrolled in Medicaid. When the MFAR rule was proposed SNAP submitted a detailed letter to the Centers for Medicare & Medicaid Services expressing our objections; you can find that letter [here](#).

If implemented, the MFAR rule could jeopardize access to care for millions of Americans. For this reason, SNAP supports your effort to delay its implementation until we have a better understanding of its implications for states and what it seeks to accomplish and we especially support your conclusion that any such significant policy changes should only be adopted when authorized by Congress. If there is anything SNAP can do to help you with this effort, please do not hesitate to contact us.

Sincerely,

Kate Finkelstein  
Legislative Liaison, Federal Affairs

