

Thomas L. Johnson  
PRESIDENT & CEO



June 28, 2011

Centers for Medicare and Medicaid Services  
Department of Health and Human Services  
Attn: CMS-2328-P  
PO Box 8016  
Baltimore, MD 21244-8016  
*submitted via [www.regulations.gov](http://www.regulations.gov)*

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On behalf of Medicaid Health Plans of America (MHPA), I am pleased to submit the following comments regarding the proposed rule on methods to assure access to Medicaid services.

MHPA is a national nonprofit organization and the leading trade association solely focused on representing Medicaid health plans. MHPA's mission is to develop and advance public policy that controls costs and improves access and delivery of quality health care to Medicaid members.

**MHPA supports the approach proposed in the rule to exempt Medicaid managed care plans from the proposed state review process.**

As the proposed rule states, managed care entities are subject to separate access review procedures in 42 CFR part 438. We believe these access requirements provide a high standard for ensuring access to providers, ensuring network adequacy, and continuity of care. States have been working with health plans for many years in ensuring that these federal standards are met, regardless of health plan payments.

The proposed rule also states that CMS is currently undertaking a review of State managed care access standards and is considering future proposals to address access issues in managed care. MHPA supports this separate analysis and looks forward to continuing to work with CMS on this effort.

Thank you for the opportunity to comment on the proposed rule. Please contact me at 202-857-5725 or [tjohnson@mhpa.org](mailto:tjohnson@mhpa.org) with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas L. Johnson', is written over a light gray background.

Thomas L. Johnson  
President & CEO