The Colorado Health Foundation™

Comments on “Agency Information Collection Activities: Submission for OMB Review; Comment Request”

March 5, 2025

Stephanie Carlton, CMS Chief of Staff and Acting Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
P.O. Box 8016
Baltimore, MD, 2124-8016
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Submitted electronically via Regulations.gov

RE: Comments on “Agency Information Collection Activities: Submission for OMB Review;
Comment Request”

Dear Acting Administrator Carlton:

The Colorado Health Foundation (CHF or the Foundation) is writing to express our support for Medicaid section 1115 waivers. They play a crucial role improving health outcomes by encouraging state innovation and ongoing improvements to Medicaid program design. Continuing them is also a key part of maintaining stability in health insurance coverage for thousands of people across our state. These waivers honor commitments the federal government has already made to its state partners and the people in those states. We urge you to continue all existing section 1115 waivers without imposing additional administrative burdens to them.

In Colorado, our Medicaid program currently includes two section 1115 waivers that impact these crucial
areas:

- **Coverage for pregnant individuals with incomes up to 195% of the federal poverty level -** Colorado's Medicaid coverage for pregnant individuals with incomes up to 195% FPL has been in place for more than two decades, since 2002. It is a key part of caring for mothers and children in our state;
- **Continuous Medicaid eligibility for Colorado's infants and children from birth to age 3 -** Continuous eligibility for infants and children has been shown to have both short- and long-term positive health outcomes; and
- **12-month continuous Medicaid coverage plus a limited package of reentry services for individuals transitioning out of incarceration and back into the Colorado community -** Ensuring that individuals transitioning out of incarceration have access to health coverage and care, including case management, mental health services, and substance use disorder supports is key to improving both short- and long-term health outcomes. These supports are so crucial that they are

endorsed by law enforcement.

As a nonprofit and nonpartisan private foundation, CHF works statewide to advance our mission to improve the health of Coloradans. Through community engagement, grantmaking, research, and private sector investments, our work aims to ensure that everyone in Colorado has what they need to be healthy. Maintaining and strengthening Medicaid is a key part of this.

The Foundation strongly supports Colorado's existing section 1115 waivers, and we urge CMS to support the ongoing implementation of these waivers without creating any additional administrative burdens to them. Please contact Kyle Legleiter, Colorado Health Foundation Senior Director of Policy, at Show email or Show phone with any questions you might have.

Sincerely,
Kyle Legleiter
Senior Director of Policy
Colorado Health Foundation

For a downloadable PDF of this letter, click here.

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BY

Kyle Rojas Legleiter