

June 23, 2023

Submitted via www.regulations.gov

Centers for Medicare & Medicaid Services
U.S. Department of Health & Human Services
Attention: CMS-9894-P
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850



John Baackes
Chief Executive Officer

Re: CMS 9894-P: Clarifying Eligibility for a Qualified Health Plan Through an Exchange, Advance Payments of the Premium Tax Credit, Cost-Sharing Reductions, a Basic Health Program, and for Some Medicaid and Children's Health Insurance Programs

As the nation's largest publicly operated health plan, L.A. Care serves more than 2.9 million enrollees residing throughout Los Angeles County in Medicaid, Covered California (marketplace) and Medicare/Medicaid Duals programs. L.A. Care is writing today to express our support for the proposed rule that would expand access to health coverage by removing a barrier to health care faced by Deferred Action for Childhood Arrivals (DACA) recipients. The rule would allow DACA recipients to obtain comprehensive health care coverage by being able to enroll in Medicaid, the Children's Health Insurance Program (CHIP), and the Affordable Care Act's Health Insurance Marketplace.

Increasing access to health care coverage for DACA recipients will also result in an increase in the rate of health care coverage for children. Approximately 29 percent of DACA recipients are parents and the majority have children that are U.S. citizens. Years of research has shown that by providing health care coverage for parents, those same parents are likely to ensure that their children are also enrolled in health coverage programs. Increased access to health care coverage also improves access to services, decreases financial stress, and provides peace of mind that parents and their children can get the health care they need when they need it.

By allowing DACA recipients to participate and access federal subsidies in the marketplace, the rule aligns with the goals of the Affordable Care Act – specifically, to lower the number of the uninsured and make health care coverage affordable to more people. Furthermore, DACA recipients represent relatively young, healthy adults and thus may improve the overall marketplace risk pool. Nearly 64 percent of DACA recipients indicate their health is excellent or very good, and an additional 28 percent report their health is good.

California currently provides Medicaid coverage (state-only funds) to low-income residents, regardless of immigration status, who are under 26 years of age or 50 years of age and older. Starting in 2024, California will provide Medicaid coverage to the last cohort of low-income residents from 26 to 50 years of age, regardless of immigration status. The rule would provide federal matching funds for DACA recipients that enroll in Medicaid. This important federal funding could potentially allow states to use state-only funds to fund health care coverage for remaining uninsured populations.

L.A. Care reaffirms its commitment to DACA recipients by supporting this important rule to ensure DACA recipients have access to comprehensive health care coverage, and we thank the Administration for its leadership on this issue.

Sincerely,

A handwritten signature in black ink that reads "John Baackes".

John Baackes



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