



June 1, 2023

Administrator Chiquita Brooks-LaSure  
Centers for Medicare and Medicaid Services  
7500 Security Blvd  
Baltimore, MD 21244

**RE: Medicaid Program; Ensuring Access to Medicaid Services**

Dear Administrator Brooks-LaSure,

The National Patient Advocate Foundation (NPAF) is pleased to submit comments on this proposed rule. We appreciate the Administration's on-going effort to strengthen the Medicaid program and to ensure all Medicaid beneficiaries can equitably access high quality, person-centered and family-focused care.

NPAF advocates for inclusive policies that elevate and integrate patient and caregiver perspectives as key pillars of equity-focused healthcare reform. Advancing equitable and affordable healthcare is the core of our person-centered agenda, in which financial and social stability are essential components of quality health care. Our direct patient services counterpart, Patient Advocate Foundation (PAF), has delivered skilled needs navigation services specifically supporting social and financial well-being for thousands of limited-resourced patients and families over its 26 years. Needs navigation, detailed in [this NPAF issue brief](#), is an effective intervention that responds to what patients and families report as their most pressing concerns that interfere with healthcare access and affordability. PAF's approach advances health equity by linking underserved individuals to community and national resources and support programs based on their unique needs and circumstances.

With this perspective, we appreciate the opportunity to make the following comments:

**Medicaid Advisory Committee and Beneficiary Advisory Group (§ 431.12)**

NPAF supports the proposed rule ensuring access to Medicaid, particularly establishing a new State Beneficiary Advisory Group to elevate the voices of Medicaid beneficiaries. Our experience working directly with patients and families is that their voice is often not heard or considered when making policy decisions about their care. Such Advisory Committees and Groups will allow beneficiaries to more directly contribute to Medicaid program policies.

As the agency works to advance beneficiary participation and engagement, NPAF is uniquely situated to serve as a resource in the development and implementation of the Medicaid Advisory Committees and State Beneficiary Advisory Groups. We would be honored to be of further help.

## Conclusion

NPAF greatly appreciates CMS' intent to meaningfully engage beneficiaries throughout rulemaking processes to understand and address continuing challenges for access to Medicaid. Patient and caregiver insights can ensure CMS is evaluating quality by measuring outcomes that reflect what matters most to people. Providing needs navigation services directly to patients and caregivers is a hallmark of PAF's two and a half decades of organizational experience, expertise, and history. We are happy to share lessons learned and welcome the opportunity to meet directly with Administration staff to discuss these comments and opportunities to scale needs navigation as part of efforts to achieve equitable and affordable healthcare reform.

Please contact me at [Rebecca.kirch@npaf.org](mailto:Rebecca.kirch@npaf.org) if NPAF can provide further details or assistance.

Respectfully submitted,

A handwritten signature in black ink that reads "Rebecca A. Kirch". The signature is written in a cursive, flowing style.

Rebecca A. Kirch  
Executive Vice President, Policy and Programs