



January 9, 2019

Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, Maryland 21244  
Submitted electronically to



x We urge C/C26<</MCID 6-0.00 EMC J -0.01p C/C22<</MCID 2<<tionp Tc6 Tc1 Tqua> M (cTc3 )y> M



Since no individual measurement is likely to ensure access, and in fact, if used alone, may provide an incomplete assessment of network adequacy, urge CMS to require states to specifically demonstrate that time and distance standards, along with multiple quantitative measures that, together, reliably and appropriately assess network adequacy, have been incorporated into their standards.

#### Require Pediatric Specialty Provider Standards

Across our health system, Nemours cares for medically complex children with specialized health care needs. CMS has previously noted that existing rules are generally not tailored to pediatric needs. We agree with this assessment and would highlight that, in Nemours' experience, specialists are often (e)]78 RTc 0 Tww[



Further, we recommend that CMS complete an assessment of access issues for certain provider types across all state Medicaid and CHIP programs to aid in more fully understanding the degree of variability in specialty provider access and identify common challenges. Such an assessment could help state and federal authorities prioritize network adequacy requirements in future rulemaking.

#### CHIP—Network Adequacy Standards (§457.1218)

Nemours supports the alignment of network adequacy standards between Medicaid and CHIP and recommends that CMS include additional standards for pediatric providers in CHIP as well. As stated in previous sections of this letter, access to pediatric specialists is imperative for child health, including for at-risk populations served by Medicaid and CHIP. Standards that prevent the exclusion of pediatric primary care and specialty care providers serve the best interest of children and their families.

at

(3r)-4-4-3Tc -g Qw 6.3.79 <<11.9 (i)su n



Sincerely,

Deborah I. Chang MPH  
Senior Vice President for Child Health Policy & Prevention  
Nemours Children's Health System