



February 13, 2023

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services
Hubert H. Humphrey Building
200 Independence Avenue, SW, Room 445-G
Washington, D.C. 20201

RE: CMS-9899-P; Patient Protection and Affordable Care Act, HHS Notice of Benefit and Payment Parameters for 2024

Dear Administrator Brooks-LaSure,

Louisiana Rural Health Association (LRHA) is pleased to offer comments on the Patient Protection and Affordable Care Act, HHS Notice of Benefit and Payment Parameters for 2024.

LRHA is a membership association that is made up of Louisiana rural health care providers. This includes rural health centers (RHCs); federally qualified health centers (FQHCs); and rural hospitals across the state. LRHA provides a unified voice that promotes and enhances the quality of rural health in Louisiana and works to ensure that all Louisiana residents have access to high quality healthcare and the opportunity to live a healthy life.

In this proposed rule, we appreciate CMS' continued commitment to the needs of Exchange customers that reside in rural areas.

Rural Emergency Hospital

In your proposal you state that you intend to add Rural Emergency Hospitals (REHs) as a provider type in the Other Essential Community Providers (ECP) Providers ECP category.

LRHA strongly supports your intention to add REHs as a provider type in the Other ECP Providers category. Rural hospitals are an essential provider of health care services in rural areas. Many of our rural hospitals serve multiple parishes and all are significant employers and economic drivers in their communities. The survival of our rural hospitals is essential to the survival of our rural residents and communities.

For Louisiana providers considering transition to a Rural Emergency Hospital, it is important that they are able to maintain current sustainability protections, including Essential Community Provider recognition. With the pending end of the COVID-19 Public Health Emergency and the expiration of the Medicaid continuous coverage requirement, our communities and providers are bracing for a potential significant "churn" of rural residents off of current Medicaid plans and into the Health Insurance Exchange. LRHA believes adding REHs to the list of ECP providers will help ensure our rural hospitals are able to continue to care for these vulnerable patients.

LRHA thanks CMS for the opportunity to to offer comments on this proposed rule and for your consideration of our comments. If you would like additional information, please contact Denaé Hebert at dhebert@lrha.org or 337.366.5915.

Sincerely,

A handwritten signature in black ink, appearing to read "Denaé", with a long horizontal stroke extending to the right.

Denaé M. Hebert
Executive Director
Louisiana Rural Health Association