



American Federation
of Teachers, AFL-CIO

AFT Teachers
AFT PSRP
AFT Higher Education
AFT Public Employees
AFT Healthcare

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Submitted via e-mail to <http://www.regulations.gov>

February 21, 2013

Centers for Medicare & Medicaid Services
U S Department of Health and Human Services
Attention: CMS-2334-P
P.O. Box 8016
Baltimore, MD 21244-8016

Dear Ladies and Gentlemen:

On behalf of our 1.5 million members, the American Federation of Teachers (AFT) welcomes the chance to comment on the proposed rule regarding Medicaid, CHIP, and Exchanges (CMS-2334-P). The AFT is a union of professionals that champions fairness; democracy; economic opportunity; and high-quality public education, healthcare and public services for our students, their families and our communities.

We applaud the decision to maintain that Medicaid eligibility determinations will be made by public servants (see Preamble, p. 4627).

While we support the “no wrong door” approach that will facilitate enrollment in the new healthcare options that will become available in 2014, we firmly believe that determining eligibility for enrollment in a public program such as Medicaid must remain the responsibility of government employees who are covered under a merit system. Such sensitive work requires integrity and transparency, and thus has been rightly entrusted to professional public workers. We are relieved that this important function will remain within their purview and will not be privatized.

We therefore support the inclusion of Section 431.10(c)(2) requiring Medicaid eligibility determinations to be delegated “only to a government agency or public authority which maintains personnel standards on a merit basis.” (Federal Register, p. 4681).

We remain supportive of the Affordable Care Act’s laudable goal of expanding access to affordable health coverage, and we are pleased that the Act will not result in the privatization of Medicaid eligibility determinations. Thank you for the opportunity to comment on this matter.

Sincerely,

Randi Weingarten
President

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