



**ALLIANCE of  
SAFETY-NET  
HOSPITALS**



April 27, 2026

Daniel Brillman  
Deputy Administrator, CMS  
Director, Center for Medicaid and CHIP Services  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard, Mail Stop S2-26-12  
Baltimore, MD 21244-1850

**Re: Request for Additional Guidance and Support for States to Leverage Public Private Partnerships for Implementing Changes Made by the Working Families Tax Cuts Legislation**

Dear Deputy Administrator/Director Brillman:

We write on behalf of the Alliance of Safety-Net Hospitals (ASH) and the Safety-Net Association of Pennsylvania (SNAP), two coalitions that represent a network of hospitals and health care providers dedicated to helping American and Pennsylvanian families stay healthy, working, and independent. We would like to thank you for your current efforts to support states in their timely and accurate Medicaid renewals of Medicaid eligibility and respectfully request that you provide states with additional guidance and information regarding a particular element of the federal statute that could be leveraged to further support those efforts.

On March 6, 2026, you sent a letter to State Medicaid Directors (SMD #26-001) regarding the implementation of Section 71107 of the "Working Families Tax Cut" legislation (Public Law 119-21), which relates to eligibility redeterminations. This guidance provides states with clear information to help them prepare for the implementation of the law's key elements. In that letter, you state that "CMS is committed to supporting states in implementing changes made by the WFTC legislation and anticipates that ongoing partnership and engagement with states and other stakeholders will inform areas of need for additional guidance."

ASH and SNAP believe that the federal Medicaid statute includes a provision that would enable states to enter into public/private partnerships to leverage private funds to support their efforts to comply with changes to eligibility redeterminations by expanding their state or local agency personnel who determine the eligibility of individuals for medical assistance.

Although the statute generally prohibits federal matching of Medicaid funds that are so-called "provider-related donations," it explicitly allows for the matching of "funds expended by a hospital, clinic, or similar entity for the direct cost (including costs of training and of preparing and distributing outreach materials) of State or local agency personnel who are stationed at the hospital, clinic, or entity to determine the eligibility of individuals for medical assistance under this title and to provide outreach services to eligible or potentially eligible individuals."<sup>1</sup>

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<sup>1</sup>[Social Security Act 1903\(w\)\(2\)\(C\)](#)

ASH and SNAP understand that the March 6 letter “represents part of a series of documents that CMS expects to issue to support the implementation of the WFTC legislation provisions”<sup>2</sup> and would like to request that CMS include in its subsequent documents guidance to states on how they can use this opportunity to expand their program integrity efforts in order to safeguard and strengthen Medicaid for vulnerable Americans without overburdening state and local tax payers.

Thank you for the opportunity to contribute to CMS’s ongoing partnership and engagement with states and other stakeholders. We welcome any questions you may have about the views we have expressed in this letter.

Sincerely,



Ellen Kugler, Esq.  
Executive Director  
ASH



Michael Chirieleison  
President  
SNAP

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The **Alliance of Safety-Net Hospitals (ASH)** is a national coalition of like-minded safety-net hospitals without dedicated sources of public funding that work together to advocate policy decisions on government health care programs, most notably Medicare and Medicaid, that ensure equitable access to care for the hardworking families who live in the communities they serve and adequate public resources for the safety-net hospitals that serve those communities.

The **Safety-Net Association of Pennsylvania (SNAP)** is the state’s leading voice for hospitals that play the most prominent role in serving low-income and medically vulnerable residents of the commonwealth, many of whom are served by Pennsylvania’s Medicaid program.

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<sup>2</sup> <https://www.cms.gov/newsroom/press-releases/cms-issues-new-state-guidance-transformative-medicare-reforms>

