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General Comment

Re: Comments on CMS-10398 #17 (CHIP State Plan Eligibility – Template CS22)

Dear Administrator Parham and CMS Review Team,

I am writing to submit a public comment in support of the revised information collection request for CHIP State Plan Eligibility (CMS-10398 #17), specifically regarding the implementation of template CS22 ("Retroactive Eligibility for Children and/or Pregnant Women").

Providing retroactive CHIP eligibility, up to two months prior to the month of application, is a vital financial safety net for low-income families and pregnant women. Health emergencies and complex diagnoses often occur before a family has formal insurance coverage established. Allowing two months of retroactive coverage ensures that providers can be reimbursed and families are not burdened with crippling medical debt for necessary treatments received prior to applying.

Furthermore, enforcing a Reasonable Opportunity Period (ROP) of at least 90 days for documentation verification provides families with adequate time to obtain necessary paperwork without fear of immediate coverage disruption. I encourage CMS to approve these template requirements to help states streamline administration while preserving essential protections for vulnerable pregnant women and children.

Respectfully submitted,

Tajuddin Henry

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