



**Elizabeth G. Taylor**  
Executive Director

**Board of Directors**

**Robert N. Weiner**  
Chair  
Arnold & Porter, LLP

**Ann Kappler**  
Vice Chair  
Prudential Financial, Inc.

**Miriam Harmatz**  
Secretary  
Florida Health Justice Project

**Nick Smirensky, CFA**  
Treasurer  
New York State Health Foundation

**L.D. Britt, MD, MPH**  
Eastern Virginia Medical School

**Ian Heath Gershengorn**  
Jenner & Block

**Robert B. Greifinger, MD**  
John Jay College of  
Criminal Justice

**John R. Hellow**  
Hooper, Lundy & Bookman, PC

**Michele Johnson**  
Tennessee Justice Center

**Lourdes A. Rivera**  
Center for Reproductive Rights

**William B. Schultz**  
Zuckerman Spaeder

**Donald B. Verrilli, Jr.**  
Munger, Tolles & Olson

**Ronald L. Wisor, Jr.**  
Hogan Lovells

**Senior Advisor to the Board**  
**Rep. Henry A. Waxman**  
Waxman Strategies

**General Counsel**  
**Marc Fleischaker**  
Arent Fox, LLP

December 23, 2019

Seema Verma, Administrator  
Centers for Medicare & Medicaid Services  
U.S. Department of Health and Human Services  
Hubert H. Humphrey Building, Room 445-G  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

Also submitted via email: [seema.verma@cms.hhs.gov](mailto:seema.verma@cms.hhs.gov)

RE: TennCare II Demonstration Inability to Comment

Dear Administrator Verma:

We are writing to ask that you extend the time period for the public to comment on TennCare II Demonstration, Project No. 11-W-00151/4, Amendment 42. The CMS comment site is blocking public comments.

Over the weekend, your comment site was blocking and/or deterring submission of comments from the public. It continues to do that today. It appears that your security certification may have expired.

Despite requests from the National Health Law Program and other organizations, CMS issued a letter of completeness for this project and set a comment period for the public that spanned the Thanksgiving and Christmas holiday seasons. Given the confusion the blocked site is generating and the serious, transformative quality of the Project, we ask that you extend the comment period to January 6, 2020.

Thank you for considering this request.

Sincerely,

  
Jane Perkins  
Legal Director