



## **Expand Medicaid using a State Plan Amendment**

### **State Plan Amendment (SPA) Advantages**

- A SPA leaves state flexibility for a unique Virginia program design.
- No CMS approval needed.
- CMS has 90 days to ask questions. If the SPA is straightforward, there are no questions to ask.
- Can be implemented quickly, back to the date first submitted.
- Coverage can start quickly, and federal funds start flowing to Virginia quickly.

### **Medicaid Waivers Problems**

- CMS must approve. It is not known if this Administration will permit a waiver for a new expansion state.
- All Medicaid waivers take time – including mandatory state and federal public comment periods.
- Waivers requested by several states would impose barriers to eligibility and services and punitive measures that would block access to care.

### **A new Medicaid Waiver is not necessary.** Virginia could use existing Medicaid waivers to

- Require service delivery via Medicaid Managed Care for cost effectiveness and efficiencies
- Offer robust mental health services and treatments for addiction (including opioid addiction)
- At the same time the legislature may want to undertake a thorough analysis of the newly eligible population to understand who they are and how the new coverage is working. This analysis could lead to data-driven waivers/changes down the road, but we would have the new coverage in place first (so people get health care and Virginia can stop forfeiting billions of federal dollars.)

### **Start coverage first!**

- The legislature should adopt a straight State Plan Amendment to initiate coverage for nearly 400,000 Virginia adult without further delay.

### **Don't go down the "waiver" path!**

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