



January 09, 2008

Acting Administrator Kerry Weems
Centers for Medicare & Medicaid Services
7500 Security Blvd.
Baltimore, MD 21244

Dear Administrator Weems:

On behalf of the American Public Human Services Association (APHSA) and its affiliates, including the National Association of State Medicaid Directors (NASMD), we are writing to express our opposition to the Targeted Case Management Interim Final Rule (TCM IFR) (CMS-2237-IFC) published in the Federal Register on December 4, 2007. The TCM IFR far exceeds the original Congressional intent as outlined in the Deficit Reduction Act (DRA).

If implemented, the TCM IFR will have a devastating impact on vulnerable populations throughout the states. In addition, it is inconsistent with current best practices such as the Medical Home Model and Disease Management that have proven success. With the implementation of this IFR, CMS is attempting to address isolated problems with the operation of TCM programs in certain states with a rule that will seriously compromise the delivery of case management services for clients in all of the states. CMS and the Medicaid program would be better served by corrective actions to address the problems that exist, where they exist, rather than potentially eliminating case management in Medicaid programs across the country.

We urge the Administration to reaffirm its commitment to providing health care to low income residents by withdrawing this IFR. Please do not hesitate to contact Barbara Edwards, Interim Director of the National Association of State Medicaid Directors, at (202) 682-0100 if we can be of assistance.

Sincerely,

A handwritten signature in cursive script that reads "Cari DeSantis".

Cari DeSantis
President

A handwritten signature in cursive script that reads "Jerry W. Friedman".

Jerry W. Friedman
Executive Director

cc:

The Honorable Nancy Pelosi, Speaker of the House of Representatives
The Honorable Harry Reid, Majority Leader of the Senate
The Honorable John Boehner, Minority Leader of the House of Representatives
The Honorable Mitch McConnell, Minority Leader of the Senate
Matt Salo, Director of Health Legislation National Governors Association
Joy Wilson, Director, Health Policy, National Conference of State Legislatures
NASMD Executive Committee

American Public Human Services Association
810 First Street, N.E., Suite 500
Washington, DC 20001
202-682-0100
www.aphsa.org