

## Next Steps on Citizenship Issue for *National* Groups

### **Administrative efforts:**

- **Comment on the regulations.** It will be important for all national groups to submit comment letters within the 30 day period that ends on August 11th. A significant number of letters that raise the same major issues (*but not written in precisely the same way with the same language*) can make a real difference in securing any changes in the final regulation. See draft comments prepared by the Center on Budget and Policy Priorities.
- **Continued outreach to key Administration officials.** Many organization's leaders have done an amazing job of contacting high level Administration officials directly during this regulatory process. The change in the Rule from the Guidance is, in large part, due to letters sent and direct contacts made. This is the last opportunity to have further high-level conversations before the regulations will become final. Calls to key Administration officials can draw more attention to comment letters your organization submits.

### **Legislative Efforts:**

- **Encourage Members to comment on the interim final regulations.** Many Members and their staffs do not have sufficient information on how the implementation of this law will affect their constituents. Some who have been focused on this issue may believe that the interim final regulations address most of the concerns raised to date. It is important that Members understand and fully appreciate the serious problems that remain — and that they are encouraged to submit their own comment letters to CMS. To this end, it's important that their staffs receive calls, e-mails and faxes regarding the Rule immediately so they can submit comments during the month of July. It would be useful to offer to draft their comment letters and to share with them the comments your organization submitted to CMS
- **Technical Corrections Bill.** The regulations do not, in any way, obviate the need for technical corrections on the citizenship requirement. For example, even with the CMS decision to exempt elderly and many disabled individuals, there is still a need for some technical drafting changes to the statute itself. Moreover, it is important that Congress be pressed to address the most significant problems that remain after the interim regulation was published, such as the failure to exempt foster care children, the prohibition on granting coverage to citizens who meet all eligibility requirements while they obtain their documents, and the continued requirement for original copies of key documents. This is particularly important in these areas, because the final regulation is not likely to be different from the interim regulation as published. Accordingly, organizations — along with other Senators — need to press the leaders of the Senate Finance and House Energy and Commerce Committees to complete action on a technical corrections bill at the earliest possible opportunity.

