



October 9, 2025

Centers for Medicare & Medicaid Services
Center for Medicaid and CHIP Services
7500 Security Boulevard
Baltimore, MD 21244
Attention: State Demonstrations Group

Re: Florida Managed Medical Assistance (MMA) 1115 Waiver Demonstration – Amendment Request (Project Numbers 11-W-00206/4 and 21-W-00069/4)

Dear Administrator:

On behalf of the Home Care Association of Florida (HCAF) and the more than 2,800 licensed home health agencies we represent, thank you for the opportunity to provide comments on Florida's proposed amendment to its Managed Medical Assistance (MMA) Section 1115 Demonstration.

HCAF strongly supports this amendment, which is required to implement Senate Bill 1156 – legislation HCAF proudly championed during the 2025 Florida Legislative Session. SB 1156 passed unanimously in both chambers and was signed into law by Governor Ron DeSantis. The law reformed the state's Family Home Health Aide (FHHA) Services Program – also known as the Home Health Aide for Medically Fragile Children Program – to expand access, strengthen training and oversight, and increase utilization limits. Importantly, it directed the Agency for Health Care Administration (AHCA) to submit this amendment request to CMS so that the Medicaid income disregard and private duty nursing (PDN) provider participation provisions could take effect. Without CMS approval, the reforms enacted in SB 1156 cannot be fully realized.

Why This Amendment is Necessary

Florida's home care system continues to struggle with severe workforce shortages that limit access to care for medically fragile children. The FHHA program, created in 2023, was designed to help fill those gaps by allowing trained family caregivers to serve as compensated aides under agency oversight. SB 1156 strengthened that foundation, but its two most impactful reforms require federal approval:

- 1. Medicaid Income Disregard:** The amendment proposes to exclude FHHA wages from Medicaid eligibility determinations. Without this change, families risk losing their child's Medicaid eligibility simply because a parent or relative is trained and paid to provide necessary care. Approval of this amendment will eliminate that barrier, ensuring children maintain coverage while families gain critical financial support.
- 2. PDN Provider Participation:** The amendment authorizes private duty nursing specialty providers enrolled under provider specialty type 221 to train, employ, and oversee FHHAs. These agencies already serve the population targeted by this program and are uniquely positioned to provide safe, effective supervision. Their inclusion is vital to expanding program capacity, particularly in rural and underserved areas where access challenges are most acute.

Program Safeguards

If approved, Florida's FHHA program will operate under strengthened safeguards established by SB 1156, including:

- A minimum of 76 hours of training, including classroom instruction, supervised clinical experience, child-specific instruction delegated by a registered nurse (RN), and ongoing competency checks.

- Current CPR certification and refresher training tied to care plan updates.
- Oversight and supervision by licensed home health agencies or PDN specialty providers, with quality monitoring through satisfaction surveys, incident tracking, and hospitalization rate comparisons.
- Utilization limits of 12 hours per day, 40 hours per week, with exceptions allowed when medically necessary and approved by the managed care organization.

These provisions ensure that families are empowered without compromising safety or quality.

Alignment With Waiver Goals

The amendment aligns with the objectives of the MMA demonstration by:

- Expanding access to home- and community-based services (HCBS) for medically fragile children.
- Preventing costly institutionalization and avoidable hospitalizations.
- Leveraging family caregivers as part of the solution to Florida's workforce crisis, while maintaining agency oversight and quality control.

Conclusion

HCAF urges CMS to approve this amendment so that Florida can fully implement the reforms enacted by SB 1156. These changes will strengthen access to care, empower families, and ensure medically fragile children can remain safely at home with trained caregivers under professional oversight.

Thank you for your consideration and for your partnership in advancing policies that strengthen in-home care for our most vulnerable patients.

Respectfully submitted,

A handwritten signature in cursive script that reads "Denise Bellville".

Denise Bellville, RN
Executive Director