

Cecile Erwin Young, Executive Commissioner
Texas Health and Human Services Commission
P.O. Box 13247
Austin, TX 78711

Re: Request for Implementation Timeline—CHIP Provisions of the Federal Eligibility & Enrollment Rule

Dear Commissioner Young,

We write on behalf of the undersigned organizations, which are committed to ensuring that Texas children have timely and continuous access to affordable health coverage.

In April 2024, the Centers for Medicare & Medicaid Services (CMS) finalized the **Eligibility and Enrollment (E&E) rule**, which removes long-standing barriers to the Children's Health Insurance Program (CHIP), including waiting periods before coverage can begin and lifetime or annual benefit caps. These reforms took effect **June 3, 2025**, and represent a significant federal effort to simplify enrollment and keep children covered.

Although Congress placed a temporary moratorium on specific E&E provisions through H.R. 1, this moratorium does **not** apply to the CHIP provisions that are already in effect. Texas now has an obligation to align state policy with federal requirements by eliminating:

- **CHIP waiting periods**, and
- **Lifetime or annual dollar limits on benefits** (Texas Health & Safety Code §62.154(d)).

We understand HHSC requested—and CMS granted—an extension until **June 3, 2026**, to allow time for statutory changes. However, families, providers, and community partners need clarity on the agency's plan to comply.

We respectfully request that HHSC provide:

1. A public **timeline and work plan** for implementing these CHIP requirements, and
2. Opportunities for **stakeholder input** as the agency develops any necessary administrative or legislative proposals.

These protections are critical for Texas children and families, ensuring that no child waits to get covered or faces arbitrary limits on essential care. We urge HHSC to prioritize this work so Texas can meet federal standards and keep kids healthy.

Thank you for your attention to this critical matter. We look forward to your response and to working with you to ensure a smooth implementation.

Sincerely,

On behalf of the undersigned organizations

Children's Hospital Association of Texas

Texas Academy of Family Physicians

Texans Care for Children

Texas Hospital Association

Texas Medical Association

Texas Pediatric Society

National Alliance on Mental Illness

Texas Public Health Coalition