

HEALTH MANAGEMENT ASSOCIATES

Memorandum

Re: Suggested questions and required documentation for ACH certification for purposes of the Medicaid waiver

Health Management Associates (HMA) was engaged by the Washington Health Care Authority (HCA) to provide support and recommendations regarding the development of components of the state's Medicaid waiver. The recommendations outlined below are HMA's advice on the application questions and documentation HCA and/or its independent assessor should solicit from ACHs to certify them to serve as the single point of accountability for Medicaid waiver Transformation Projects. These suggested questions and documents are meant to serve as a starting point for the HCA and/or its independent assessor for the development of the certification application and are tied directly to the ACH Essential Components HMA has recommended in a separate deliverable. In addition to providing guidance to the HCA in developing the certification process, this document may help ACHs identify technical assistance needs or other resources or supports that will be needed to meet the Medicaid waiver certification requirements.

Recommended Essential Component	Suggested Application Questions	Suggested Documentation
Legal Entity	What type of legal entity (organization) is your ACH?	Articles of Incorporation Bylaws
Governance	Identify members of the board, roles and responsibilities and how members were selected. Describe how members provide adequate representation of the region. Describe the decision-making process, including how conflicts	List of Board members and their organizational affiliations Bylaws

111 SW 5TH AVENUE, SUITE 3150, PORTLAND, OREGON 97204
TELEPHONE: 360.688.750 | FAX: 360.489.0492
WWW.HEALTHMANAGEMENT.COM

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Recommended Essential Component	Suggested Application Questions	Suggested Documentation
	<p>will be resolved.</p> <p>Describe how conflicts of interest of members will be identified and managed/mitigated.</p> <p>Describe how sub-regions and/or populations within the region will be considered equitably in the work of the ACH.</p> <p>Describe how the ACH will ensure a transparent governing process (e.g., Will board meetings be public? How will Board decisions be shared?)</p>	
<p>Community Collaboration & Stakeholder Engagement</p>	<p>Demonstrate ACH strategy for partnering with regional organizations not directly represented on the board.</p> <p>Describe how the ACH engages stakeholders, representative of the geography and populations the ACH serves.</p> <p>Describe how consumers (e.g., Medicaid beneficiaries) provide feedback to the ACH about RHNI/RHIP and Transformation Project selection and</p>	<p>Letters of Understanding with key partners</p> <p>List of public meetings / communications plan (if available)</p>

Recommended Essential Component	Suggested Application Questions	Suggested Documentation
<p>Capacity for financial administration/management</p>	<p>performance.</p> <p>Describe the processes that will be implemented to support financial success and sustainability.</p> <p>Describe the key financial functions that will be established by the ACH to ensure financial transparency and strong financial management, including:</p> <ul style="list-style-type: none"> • Budgeting; • Funds distribution oversight; • Identify planned use of internal and/or external auditors. • Describe how the ACH will establish a financial compliance program in adherence with state law. • Shared savings determination and reinvestment; • Planning for financial sustainability 	<p>Financial policies</p>
<p>Operations Capacity, including Transformation project administration /management</p>	<p>Describe staffing / contractual relationships to meet the accountabilities of an ACH</p> <p>To the extent applicable,</p>	<p>Staff list</p> <p>Contracts</p>

Recommended Essential Component	Suggested Application Questions	Suggested Documentation
	<p>describe the processes that will be established to ensure data security and privacy.</p> <p>Describe how the ACH will select projects</p> <p>(If applicable) Describe Transformation Project Advisory Committee (TPAC) was formed; how were members selected;</p> <p>Describe how the Transformation Project selection process will ensure input from the clinical community and managed care health systems</p> <p>Describe how the ACH will monitor transformation project performance.</p> <p>Describe how the ACH will respond to projects that are underperforming/not meeting established performance milestones and/or metrics.</p> <p>Describe the process for removing projects that fail to address/remediate identified issues within a prescribed</p>	<p>Data/ IT policies (including data sharing agreements, performance management tools, and reporting capability)</p> <p>TPAC membership list (if applicable)</p>

Recommended Essential Component	Suggested Application Questions	Suggested Documentation
	timeline	
Accountability for RHNI and RHIP	Describe the process for completing a Regional Health Needs Inventory (RHNI) and Regional Health Improvement Plan (RHIP)	List of existing data sources that will be used
Accountability for Spread of Learning	Describe mechanisms for supporting the transformation projects and spreading learning across projects and with other ACHs)	MOU with any practice hubs in region (should reference opportunities developed under the SIM grant to avoid duplication)

Recommendation for ACHs initially unable to meet requirements outlined above

HMA recognizes that not all ACHs have equal capacity and resources to meet the requirements outlined above on the same time frame. Therefore, we recommend that HCA establish a process by which an ACH can achieve an interim step towards Medicaid waiver certification through a “Development Plan” with milestones established to ensure that essential components will be in place within an agreed upon timeline. This plan should identify what requirements have been met and what work will be done (with clear milestones and plans for achieving them) to meet the remaining requirements. The ACH should also identify technical assistance needs it has for which the HCA may be able to provide support.

ACHs not yet able to meet Medicaid waiver certification requirements but with an approved development plan in place would be eligible to receive any planning grants or technical assistance support the state may offer and begin the process for Transformation Project selection, but no Medicaid Transformation waiver investment funds can be distributed to the ACH until it has met the Medicaid waiver certification requirements.