



Draft Medicaid Contract for Apple Health – Fully Integrated Managed Care

The Cascade Pacific Action Alliance appreciates this opportunity to comment on the “Early Adopter” draft Medicaid Contract for Apple Health – Fully Integrated Managed Care. We understand and respect your need to expedite the public comment period in order to meet contracting deadlines and we thank you for extending the comment deadline to make it possible for us to provide our comments.

Given the considerable length of the draft contract, our comments are necessarily based on a cursory review of the document. It is our hope that we will have the opportunity to engage with you and your colleagues over the coming months in a more thorough review and deeper discussion of the core elements of the contract. We would welcome this opportunity for dialogue in particular assuming the draft contract is intended as a template for future contracts applicable to our region.

Comprehensive Approach

In keeping with our region’s interest in pursuing broader population health improvements through the Accountable Community of Health - reflected in our recent comments on the potential role of ACHs in Medicaid Purchasing in general (see attached document) - we urge the state to take a comprehensive view. It is our hope that such a broader view will guide future iterations of this contract that pertain to our region.

Gain Sharing and Reinvestment

In reviewing the draft, an area on which we would like to comment pertains to the mechanism for identifying, capturing and reinvesting shared cost savings. We would like to emphasize the importance of partially sharing cost savings with the Accountable Community of Health to allow reinvestments in advancements of population health. Meaningful gain sharing is vital to support our region’s ability to improve the health of our communities through investments outside of the clinical realm. It is essential to sustain our region’s interest and the engagement of our stakeholders in the Accountable Community of Health. At present, the draft contract does not appear to reference the intent to share gains with the Accountable Community of Health. We would encourage clarifying the contract such that this link is explicitly made.

Final Thoughts

We would warmly welcome the opportunity to engage with the state in a more detailed conversation about our region’s thoughts on health system transformation over the coming months. We believe that our region can be very helpful and effective in advancing population health improvements in partnership with the state, Medicaid Managed Care Organizations, and many other health stakeholders. Developing such a collaborative approach, however, will take time.

Thank you once more for extending the comment deadline on the “Early Adopter” contract. We hope the comments above are helpful and we look forward to hearing your response and engaging in a deeper dialogue.

May 4, 2015