



October 8, 2015

Victoria Wachino, Director
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
200 Independence Avenue, Southwest
Washington, DC 20201

Re: Washington Application for Medicaid Transformation Waiver

Dear Ms. Wachino,

Empire Health Foundation is pleased to enthusiastically support Washington State's proposed Section 1115 Medicaid waiver. This ground breaking and innovative approach positions our State to achieve the Triple Aim of better care, better health, at reduced costs. It will also provide flexibility and a federal funding vehicle for locally determined investments and reinvestment of savings into "upstream" root causes of poor health outcomes and the social determinants of health.

Empire Health Foundation is a private health conversion foundation formed in 2008 through the sale of a nonprofit hospital system in Spokane. As the largest private foundation in Eastern Washington, we invest in ideas and organizations that improve access, education, research and policy to result in a measurably healthier region. EHF has collaborated in key public-private partnerships to: (1) improve the rate of uninsured from 13.1% to less than 2% in our metro core; (2) increase the pipeline of primary care physicians by 30% and on our way to 60%; and (3) reduce obesity rates by 7.8% in children in one example community.

There are many aspects of the waiver approach we support to produce similar measurable results, including:

- Utilizing Accountable Communities of Health and Coordinating Entities to organize transformational activities;
- Using Delivery System Reform Incentive Payments to fund outcome-based activities;
- Reducing institutionalization, with continued movement away from institutional settings to more cost-effective home and community based supports;
- Focusing on improved population health;

- Instituting payment reform to incentivize better health outcomes; and
- Incorporating a holistic approach that recognizes the importance of social determinants of health, including housing supportive services.

We are particularly enthused by the role for Accountable Communities of Health (ACH). The opportunity for local communities to develop reinvestment strategies to capture savings from interventions is game-changing. As Washington State Health Care Authority's contractor for the ACH Technical Assistance Project, Empire Health Foundation is actively working to strengthen our state's nine ACHs via robust, evidence-based learning opportunities, trainings and access to a stable of nationally renowned consultants.

We also believe there may be an opportunity for the establishment of intermediary(ies) to provide backbone and other support to Coordinating Entities. This back office support could include financial, Information Technology and Human Resources as well as the management of Delivery System Reform Incentive Payments which are performance-based financial incentives designed to achieve delivery system reform. Intermediary(ies) such as Empire Health Foundation could act as a primary point of accountability for the State, working with the State and partner organizations to assure sustainability, a key tenet of the waiver proposal.

Empire Health Foundation is supportive of the waiver's direction and stands poised to partner with the Health Care Authority in this effort.

Sincerely,



Antony Chiang
President



Kristen West Fisher
Vice President Programs