



2/19/2016

Community Transformation Team
Washington State Health Care Authority
626 8th Ave SE
Olympia, WA 98501
Via email: medicaidtransformation@hca.wa.gov

Regarding: Medicaid Transformation Waiver Project Proposal Feedback

Dear Community Transformation Team,

I am writing on behalf of Molina Healthcare (Molina), in response to the HCA's solicitation of comments on the project ideas submitted for the 1115 Medicaid Transformation Waiver. We appreciate that copies of all proposals were posted on the Healthier Washington website for public review and comment. As you move to the next round of negotiations with CMS, Molina encourages the Healthier Washington team to take the following points into consideration.

1. *Include strategies which address care management for members with complex health and social issues while avoiding duplication.* Molina supports Washington's effort to move toward whole person care. Managing the social determinants of health, and understanding and coordinating care management are a crucial pieces of the puzzle. Given the high volume of project proposals submitted with a theme of care coordination or care transitions, we urge the Healthier Washington team to avoid overlap and duplication in care coordination efforts. Overlap and duplication will create waste and confusion for members rather than efficiencies. Many parties want to be key participants moving forward, and the Healthier Washington team has the ability to guide an efficient care management program structure.

Molina already offers robust and growing community based care management and coordination to high needs members in every community through our successful Care Management programs. Molina's Care Management programs include relationships with community based care coordination entities as well as Molina employed community based care management teams. These care management teams actively engage high needs members and include both clinical (Care Manager) and non-clinical (Community Connector) staff. Community Connectors are trusted members of the community who serve as extenders for clinicians by linking members with community based organizations that offer services beyond those provided through Medicaid and have a positive impact on social determinants of health. We believe managed care plans are in the best position to engage these members and work together to build upon current program investments in IT and care management staff.

One example of successful care coordination that we want to build on and urge the Healthier Washington team to consider is a project that was submitted by Molina:

- #77 - Care Coordination for High Utilizers (Snohomish County)

This program is modeled after a highly successful, innovative, cross-sector care coordination collaborative between Molina Healthcare of Washington, Snohomish County Human Services Dept., and Snohomish EMS. Given our promising results, that intervention led to a 45% reduction in the number of unnecessary calls to EMS and a 73% reduction in unnecessary ED visits for all but two members. We strongly encourage consideration of this project.

2. *The transformation to “whole person” health care which Healthier Washington is committed to cannot be fully realized until oral health is integrated into “whole person” health.* Firstly, we want to express our support for the following oral health related transformation project proposals submitted to the Health Care Authority:

- #95 – Dental Emergencies Needing Treatment - DENT
- #96 – Healthy Mouths, Healthy Mothers, Healthy Babies: Improving Oral Health in Thurston County)
- #97 School Based Health Centers (SBHCs) and SBHCs with Oral Health Care
- #108 Statewide Surveillance and Quality Assurance System (Dental)

No Body Part Left Behind: While we support these projects and their likely real impact on improving dental care access for targeted high needs populations; we firmly believe these projects are interim stop-gaps and precursors to what Washington really needs, which is to move all Medicaid dental services from fee-for-service to Managed Care. Healthier Washington has a stated commitment to the promise of “whole person” health. This promise cannot be fully realized until oral health is included and integrated into “whole person health”. Research has confirmed that improving the oral health results in better health and overall reductions in medical spending. We are working today to test our hypothesis that current Oral Health spend (both preventive and Emergency) may be adequate when combined, to cover all Oral Health services under managed Medicaid, with enough surplus to increase dental fee schedules and thereby increase dental access.

We request that HCA leverage the Transformation Waiver to pilot inclusion of oral health in Medicaid Managed Care in at least one ACH. Based on preliminary conversations, it is our understanding that at least two regional ACHs are highly motivated to and interested in exploring such a pilot. Molina is ready, willing and prepared to be the lead MCO in the pilot. It is our understanding from the HCA that a CMS waiver is not required to conduct such an oral health pilot. Once proven successful, the single Region pilot would be spread to all regions under Apple Health Managed Medicaid.

3. *Given the irrefutable impacts smoking has on health, Molina encourages the Health Care Authority to give strong consideration to the following project:*
- #122 - Smoking Cessation – Time to Move the Needle

The primary goal of this project would be to ensure that tobacco cessation treatment is fully covered by Medicaid for adult and teen enrollees diagnosed with a mental illness or substance use disorder. The covered treatment should also be of sufficient intensity and include evidence-based components proven to achieve smoking cessation among people with behavioral health conditions. Molina supports this project and its intent for full Medicaid coverage of tobacco cessation services.

We appreciate the opportunity to comment on the waiver projects submitted. Molina remains committed to working with HCA to serve the most vulnerable members of our state. Should you have additional questions or desire additional information, please contact me directly by email at laurel.lee@molinahealthcare.com or by phone at 425-424-1121.

Sincerely,



Laurel Lee
Vice President, Member and Community Engagement
Molina Healthcare Washington, Inc.

CC: Peter Adler
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