



PRSN

PENINSULA REGIONAL SUPPORT NETWORK
Providing Public Mental Health Services in
Clallam, Jefferson, and Kitsap Counties

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September 30, 2015

Vikki Wachino, Director
Center for Medicaid and State Operations
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Ms. Wachino:

I am writing regarding the 1115 Medicaid Waiver Application that has been submitted by Washington State. I do not believe that Washington State should be granted this waiver at this time. The Waiver is very ambitious, which I believe is the main reason it should not be submitted.

Less than a year ago, the architect of Accountable Communities of Health was unable to describe their function, alluding to the fact that they were a work in progress and time would determine their function. I would suggest that that is still the case for many of the ACHs, and they are in no way ready and prepared for the function described in this waiver document. Some are actually still determining their governance structure. I do not believe that any entity that joined an ACH as it was forming had any intention to join an administrative structure that was responsible for implementing and sustaining performance on yet to be described transformation projects. Having watched the Health Care Authority create Health Homes then take the project down, and pour immense efforts into creating the Medicare/Medicaid Transformation project only to see it never be implemented, it is hard to have faith in yet to be announced future transformation projects.

I believe that the second initiative in the application shows significant promise, and it is the initiative which I feel the state should pursue through a separate Waiver process. Expanding the eligibility for Medicaid and home supports is a great idea, and one I support wholeheartedly.

In the waiver text, it does not feel like the third initiative is described fairly. The quick reader might be confused by the language and assume that Waiver funds will be used to provide housing to eligible individuals, though all that is being funded is supportive services. What individuals eligible for this service really could use is rent subsidies, something that these funds cannot be utilized for.

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Center for Medicaid and State Operations
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Finally, the Waiver does not make clear at all that these are NOT NEW FUNDS, and that it is required that the State save an equal amount of funding in other places in order to free up these funds. While it is easy for the state to estimate savings of sufficient amount to make up the funds, when the fifth year comes up, it will be rates paid to managed care companies and Behavioral Health Organizations which will be cut to deliver the savings.

Washington's Medical system has been in the throes of Transformation for five years now, with initiative after initiative rolled out by the Health Care Authority designed to save money. I think it is incumbent upon the state at this time to stop promulgating incessant change, and evaluate some of the initiatives which have been enacted to determine if they have performed as designed. Please deny this waiver application until such time as the state has done so to your satisfaction. Let the service community and managed care organizations catch our breath, strengthen our provider networks, and fully embrace the changes previously promulgated prior to embarking on another transformation of this magnitude.

Sincerely,



Anders Edgerton
Regional Administrator