



COMMUNITY
HEALTH NETWORK
OF WASHINGTON

Washington
Association of
COMMUNITY
& MIGRANT
HEALTH
CENTERS

October 8, 2015

Submitted Electronically to [Medicaid.gov](https://www.Medicaid.gov)

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

RE: Public Comments Regarding Washington State's Application for a Section 1115 Waiver Demonstration – the Washington State Medicaid Transformation Waiver

Dear Ms. Wachino:

The federally qualified health center (FQHC) members of the *Community Health Network of Washington* and the *Washington Association of Community and Migrant Health Centers* appreciate this opportunity to provide written comments to the Centers for Medicare and Medicaid Services (CMS) on Washington State's application for a Section 1115 Waiver Demonstration – the Washington State Medicaid Transformation Waiver. We are excited that Washington State will join a handful of other states that are pursuing innovative ways to transform health care delivery.

Washington State's 26 FQHCs operate over 200 clinic sites across the state—in both rural and urban areas across Washington. Collectively, these sites serve over 885,000 patients, with the majority enrolled in Medicaid. For over 40 years, these FQHCs have provided comprehensive health care to their patients, including medical, dental, behavioral health and pharmacy services. As the state turns its attention to addressing the difficult challenge of pursuing the Triple Aim by addressing population health, we are committed to being good partners and sharing our experience and knowledge of caring for Washington State's low income and other special populations.

We support the state's strategy of providing flexibility to fund nontraditional services for targeted populations and allowing the use of federal savings to finance health transformation projects. This will not only accelerate change across systems but also move towards paying for value of care rather than volume. Beginning to address the social determinants of health, such as housing and employment will also help to ensure the health and well-being of Washingtonians. Addressing the impending "age wave" and the corresponding demands on the current long-term care system should help to ensure that there are sufficient resources to go around and that seniors do not have to spend-down their savings in order to access needed services.

In an effort to be good partners on this journey, we offer the following comments to strengthen the state's efforts:

The State Needs to Demonstrate an Ongoing Commitment to Sharing Information and Involving Stakeholders

As the state developed its Section 1115 Waiver Demonstration application, it made commendable efforts to engage all interested stakeholders, including the FQHCs, in the process. As we move forward, we urge the state to remember that further refining the substance of the waiver and implementing significant changes will require the support and efforts of all key stakeholders. Stakeholder support will only result from stakeholders feeling that they have meaningful ways to keep abreast of developments and provide input.

We strongly encourage the state to continue engaging with stakeholders as we move forward in this endeavor. This would include the following:

- As the negotiations begin, the state should provide comprehensive and timely updates to stakeholders;
- As negotiations progress, the state should leverage the knowledge and expertise of the stakeholder community as a resource to validate various terms and conditions being discussed and evaluated;
- Once negotiations conclude, the state should publish final terms and conditions for public comment; and
- As topical workgroups (as detailed in the Medicaid Transformation Waiver application) are developed, the state should ensure that information about how to participate in the workgroups is widely publicized and that all groups are truly open for participation.

All Interested Stakeholders, Including FQHCs, Should Have a Role in Governing Accountable Communities of Health

A key initiative in supporting the state's transformation building blocks is the nine regional Accountable Communities of Health (ACHs). ACHs first appeared in the state's health care innovation plan (known as Healthier Washington), and were envisioned to be private-public collaborations tailored by region to improve the health of their community.

In the Section 1115 Waiver Demonstration application, the ACHs' role is further refined. They will serve as conduits of process and performance-based payments that will be distributed to providers and community-based organizations that undertake defined transformation projects. Given that the state envisions a sizable portion of funds to be channeled through ACHs, it is imperative that all sectors of the community—including key Medicaid stakeholders—have a role in governing the ACH and directing these funds. We urge the state to ensure that there is adequate and comprehensive sector representation. This should include participation at the governing level from a wide sector of health care providers—including FQHCs and Medicaid managed care organizations, which play a vital role in caring for more than 30 percent of the state's Medicaid population.

The State Needs to Ensure that Funds are Allocated Primarily to Population Health Activities

Through this Section 1115 Waiver Demonstration, the state is seeking a significant federal investment (and the authority necessary to use these funds) to achieve the goals outlined in its application. For a

state with a \$10 billion Medicaid budget, this additional federal investment is significant. As a key safety net provider system, we want to ensure that the majority of these funds are used to support and pursue the population health activities outlined in the state's Section 1115 Waiver Demonstration application. While we understand that the state, along with the ACHs will encounter some administrative burdens and associated costs, we ask the state to develop a plan that outlines how these funds will be spent. We encourage CMS to push the state to share this plan with stakeholders in a timely manner and solicit input from the community. The population health projects envisioned by the Section 1115 Waiver Demonstration are commendable vehicles to help the state get closer to achieving the Triple Aim and we want to ensure that they have the adequate resources to ensure their success.

Washington State's FQHCs are continually striving to improve the health care services it provides to its patients, including its more than 500,000 Medicaid enrollees. We are pleased to support the state's application for a Section 1115 Waiver Demonstration and look forward to engaging in the development and implementation of the waiver, especially through the workgroups identified in the state's application. If you have any questions about our comments, please do not hesitate to contact us at Lance.Hunsinger@chpw.org or (206) 515-4710; or at MLooker@wacmhc.org or (360) 786-9722 ext. 224.

Sincerely,



Lance Hunsinger
Chief Executive Officer
Community Health Network of Washington



Mary C. Looker
Chief Executive Officer
Washington Association of Community and
Migrant Health Centers