



WASHINGTON ACADEMY OF FAMILY PHYSICIANS

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

October 9, 2015

Dear Ms. Wachino:

On behalf of over 3,300 members of the Washington Academy of Family Physicians (WAFP), we are writing to express support for the Washington State Medicaid Transformation Waiver.

The requested waiver is consistent with and will help bring to scale the state's Health Care Innovation Plan, the merits of which have been previously noted by WAFP to include:

- An emphasis on primary care. It implicitly acknowledges the value of family physicians, and the patient centered, whole-person approach WAFP members embraced in choosing a career in medicine.
- A goal of improved health, not simply better health care. This is achieved through an integrated, team-based strategy which moves beyond the clinical setting to engage not only public health, but other social services which contribute to well-being.
- Payment reform as a foundational component. This aligns closely with WAFP's vision for a value-based, accountable payment system which promotes quality outcomes, and is essential in order for these improvement efforts to be sustained.

Our endorsement is not without some reservations. The breadth and complexity of the waiver proposal, and the expedited process under which it has been designed and made available for review, leave us uncertain about many of its practical details. We trust, however, the Health Care Authority will follow-through on its promise of transparency and opportunities for us to engage as these details are negotiated. Among other things, WAFP will be looking to assure that:

- Key components of the waiver, including Accountable Communities of Health and their transformation projects, are designed and operate in a way which supports physician practices without onerous administrative or regulatory requirements.
- Any physician performance standards adopted under the waiver are evidence-based, and consistent across the state and with other payments systems, including Medicare.
- Additional expectations imposed on primary care providers, either individually or as care coordinators, come with appropriate additional resources.

- “Assistance” available to physicians under the waiver is actually useful to them in their day-to-day practices, and not simply what the state or others assumes will be useful.

Echoing the comments submitted by others, WAFP believes that the transformation envisioned under Washington’s application must progress in a way which is financially viable for physicians, avoids additional administrative burdens, and promotes quality patient care. A waiver true to these principles, done *with* and not *to* key stakeholders, holds great promise and is something which the WAFP will continue to support.

Sincerely,



Tony Butruille, MD
President



Karla Graue Pratt
Executive Vice President