



October 9, 2015

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

Dear Director Wachino:

Amerigroup Washington (“Amerigroup”) appreciates the opportunity to comment on the 1115 Medicaid Transformation Waiver Demonstration application submitted by the Washington State Health Care Authority (“HCA”) currently under review by the Centers for Medicare & Medicaid Services (CMS).

Amerigroup Washington is a subsidiary of Anthem. At Anthem, we believe that all health care is local. Anthem and its affiliated health plans have the strong local presence required to understand the health and social support needs of consumers.

Since 2012, Amerigroup Washington has operated as a health plan under Anthem’s government business division. We care for more than 140,000 members in Washington through Medicaid and Medicare, including children and low-income families, seniors and people with disabilities, and populations with complex and often chronic health needs.

Through our ongoing outreach and education we encourage healthy behaviors that can reduce illness and improve the quality of life for our members. Amerigroup believes that the solutions to the health care challenges facing our members begin when we put our care and compassion to work one individual at a time. Amerigroup Washington strongly supports HCA’s vision of transformation and integration. We recognize that many pivotal details of the waiver are under discussion among participating stakeholders. We applaud HCA for continuing to collaborate with health plans, providers, and consumers to identify the best policies, program specifics, and tools required to make this application successful.

One of the most critical portions of the waiver request to ensure success will be the utilization of “year zero” to assure the state has ample time and resources to develop the infrastructure and support necessary to accomplish the objectives set out in the application. We strongly believe the success of the waiver hinges on the inclusion of a “year zero” and the continuing of robust stakeholder engagement already begun by HCA. In order for the waiver to be successful the following points need to be carefully considered and addressed.

- There needs to be transparency of all facets of the waiver, including rate-setting, delivery of services and data exchange. This transparency must occur on all levels, from plans to providers and most importantly, to the members.

705 5th Avenue South, Suite 110
Seattle, Washington 98104
206-695-7081

www.amerigroup.com

- Medicaid beneficiaries deserve sustainability, predictability and flexibility when it comes to their health plan decisions. This application supports this by allowing for regionalization to occur so that members have access to the care they need.
- An additional component integral to the waiver's success will be the establishment of a data repository that enables the collection, storage and sharing of data that will lead to better health care outcomes. The ability to refine the data into meaningful and useful information will support the development of more appropriate care models while ensuring the proper payment structures can be instituted and be self-sustaining.

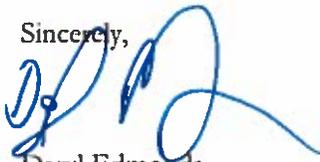
As additional details emerge about the functionality of the Accountable Communities of Health managed care organizations will be better positioned to help our members navigate the different systems of care coordination. Amerigroup looks forward to additional dialogue with the relevant stakeholders and ultimately we believe that this waiver demonstration will lead to enhanced health outcomes, fiscal accountability and significant reinvestment of savings in successful programs.

With the transformational changes outlined in the waiver application the authority for governing managed care organizations must remain with HCA. The potential insertion of an additional layer between MCOs and their state partners could lead to wasteful complexity, increased member confusion, and reduced transparency and program integrity.

Amerigroup Washington State deeply appreciates our collaborative working relationship with HCA. The thoughtfulness and inclusion by which its leadership team has managed this process has been effective and productive. We look forward to continuing our engagement as an active stakeholder for the remainder of this process and into the foreseeable future.

If I can be of any further assistance, please do not hesitate to contact me at (206) 674-4468.

Sincerely,



Daryl Edmonds
President
Amerigroup, Washington