



The Association of Washington Healthcare Plans

October 9, 2015

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

Re: Application for a Medicaid Transformation Waiver

Dear Director Wachino,

On behalf of Association of Washington Healthcare Plan (AWHP) member healthcare plans, I am writing to provide comments regarding the Washington State Health Care Authority (HCA) and Department of Social and Health Services' (DSHS) application to the federal government for a five-year Medicaid Transformation Demonstration Waiver --- through Section 1115 waiver authority.

AWHP is an alliance of our state's fifteen largest Health Maintenance Organizations (HMO), Health Care Service Contractors (HCSC), and Disability Insurers. Its diverse membership is comprised of local, regional, and national healthcare plans serving the needs of consumers, employers and public purchasers. Together, AWHP member healthcare plans provide health care coverage to over 6 million residents of Washington State.

AWHP members are committed to providing safe, high quality, cost-effective healthcare coverage to the residents of WA State and appreciate the opportunity to comment on the Washington 1115 Waiver Application. Our member healthcare plans support the broad concepts expressed by the waiver application's stated goals: reducing avoidable use of intensive services, improving population health, accelerating the transition to value-based payment, and, ensuring that Medicaid cost growth is 2% points lower than national trends. Additionally we appreciate the Washington Health Care Authority's (HCA) recognition of the need to focus on more than high-quality, traditional healthcare for individuals in order to promote better health outcomes for populations. We look forward to working with HCA to define the elements within the waiver and are committed to working on the details related to implementation.

Moving forward, we strongly invite you to include stakeholders and the value we bring to this process. This would include:

- As the negotiations begin, providing comprehensive and timely updates;
- As negotiations progress, leveraging the knowledge and expertise of the community as a resource to validate various terms and conditions discussed and evaluated;
- As negotiations conclude, publishing final terms and conditions for public comment; and
- As topical workgroups (as detailed in the Medicaid Transformation Waiver application) are developed, ensuring information about how to participate in the workgroups is widely publicized so that all groups may participate.

Thank you for the opportunity to share these comments and perspectives. Please do not hesitate to contact me with any questions or to discuss.

Regards,



Sydney Smith Zvara
Executive Director

Cc: Nathan Johnson
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AWHP is an alliance of licensed Health Maintenance Organizations (HMO), Health Care Service Contractors (HCSC), & Disability Insurers. Its diverse membership is comprised of local, regional, & national healthcare plans of varying size, serving the needs of consumers, employers, & public purchasers. Together, they provide health care coverage to over 6 million residents of Washington State. AWHP members include Aetna, Amerigroup, Cambia Health Solutions, CIGNA, Columbia United Providers, Community Health Plan of WA, Coordinated Care, Group Health Cooperative, Kaiser Permanente, Moda Health, Molina, HealthNet, Premera Blue Cross, Providence Health Plan, & UnitedHealthcare.