

February 24, 2016

Ms. Victoria Wachino
Director
Center for Medicaid and CHIP Services
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**VCU Health System
Administration**

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Marsha D. Rappley, M.D.
Vice President for
VCU Health Sciences and
Chief Executive Officer
of VCU Health System

Dear Ms. Wachino:

On behalf of the Virginia Commonwealth University Health System (VCUHS), I am pleased to submit this letter in support of Virginia's 1115 Demonstration waiver requesting authority to implement the Medicaid Managed Long Term Services and Support (MLTSS) and the Delivery System Reform Incentive Payment (DSRIP) initiatives. The vision outlined by the Virginia Department of Medical Assistance Services (DMAS) to align these strategies provides an opportunity to strengthen the Commonwealth's Medicaid program while enhancing the services provided to Medicaid beneficiaries.

As the largest safety net provider in the Commonwealth, VCUHS is supportive of the ideas that DMAS has outlined in the waiver application. Our commitment to serving the state's low income, vulnerable populations extends to the investments that have been made in building Virginia Premier Health Plan, the state's second largest Medicaid Managed Care Organization and a participating plan in Virginia's Commonwealth Coordinated Care (dual eligible) demonstration. From the perspective of both a provider and payer, VCUHS is supportive of the concepts delineated throughout the waiver as they will create opportunities to improve the health care delivery system and develop alternative payment models. Our team is prepared to support the Commonwealth's initiative by providing an appropriate level of funding support, as well as serving in a leadership role as a regional Coordinating Entity to implement the proposed Virginia Integration Partners (VIP) model.

In regards to the MLTSS initiative, we applaud the approach that DMAS has taken to utilize managed care principles to create a more coordinated system of care. The waiver builds upon the "lessons learned" from the Commonwealth Coordinated Care (CCC) program by establishing a comprehensive model to align payers and providers to address the needs of the MLTSS

population. VPHP's experience in working with providers to pilot initiatives for the CCC dual eligible population has provided insight into the opportunities that exist to strengthen the care coordination models. We believe the ideas proposed in the waiver will provide the framework to sustain these payer/provider partnerships in the future.

Finally, the VCUHS faculty and staff are supportive of the Commonwealth's proposal to utilize the DSRIP initiative to transform the health care delivery system and incentivize providers to deliver more person-centered care. The initial goal of focusing on high risk and high utilization Medicaid beneficiaries presents an opportunity to significantly impact health outcomes and costs for a complex population. As an urban academic medical center, VCU Health System has spent over 30 years developing and evaluating pilot programs for vulnerable populations in Central Virginia that utilize many of the same concepts outlined in the proposal. Hence, VCUHS has a sincere interest in working with DMAS to establish a Virginia Integration Partners (VIP) network in this region of the state. The principles outlined for the VIP related to the integration of behavioral health and primary care, collaboration with community organizations to address health-related social issues, enhancement of care coordination support, and alignment with long term services are based upon best practices that have demonstrated positive outcomes for programs across the country. In addition, the introduction of partnerships with Medicaid Managed Care Organizations to develop alternative payment models will provide the incentive to establish sustainable programs that support innovation and collaboration. By introducing the VIP models across the Commonwealth, DMAS will provide a framework for payer, provider, and support services partners to coalesce around the common goal of improving the health of defined populations of Medicaid beneficiaries.

Virginia's 1115 waiver represents an opportunity to continue to transform the Commonwealth's Medicaid program while accelerating the implementation of alternative payment models. VCU Health System strongly supports the programs outlined and is confident they will achieve the goals set forth in the waiver. Your serious consideration of this proposal would be greatly appreciated.

Sincerely,



Marsha D. Rappley, M.D.
Chief Executive Officer, VCU Health System
VCU Vice President for Health Sciences