

September 30, 2019

TO: Deborah Correia Morales, AE Program Director, Rhode Island Medicaid
Executive Office of Health and Human Services

FROM: Matthew Harvey, Sr. Director of Government Programs,
Integra Community Care Network

RE: Feedback on the draft Rhode Island Executive Office of Health and Human Services (EOHHS)
Medicaid Program Accountable Entity Roadmap Draft for Public Comment August 30, 2019

Integra welcomes the opportunity to provide feedback on the draft Rhode Island Executive Office of Health and Human Services (EOHHS) Medicaid Program Accountable Entity Roadmap Draft for Public Comment dated August 30, 2019. We are committed to the success of the program, and look forward to our continued partnership in transforming the health care delivery system for Medicaid beneficiaries.

Integra supports the overall direction EOHHS has outlined in the Accountable Entity (AE) Program Roadmap document, including the core pillars of the AE program structure. Consistent with Integra's feedback previously shared with EOHHS, we support standardization and simplification of the requirements for Year 3, and future years, in the administration of the AE program for the MCOs and the AEs.

Integra appreciates efforts to simplify and standardize the certification process and Health System Transformation Project (HSTP) plan approval process. We are concerned that requiring AEs to submit their certification applications and project plans with each partner MCO will lead to both duplication and unnecessary variation for AEs that have contracts with multiple MCOs. We strongly recommend that if the goal is standardization, EOHHS should be specific and prescriptive about the form, content, and standards for a single AE certification and HSTP submission to eliminate unnecessary administrative burden.

Integra supports the progressive movement from volume-based to value-based payment arrangements. Integra does not believe that the program is mature enough to support taking on downside risk in PY3, and encourages EOHHS to move judiciously towards adding risk to the program. In this light, Integra would like to better understand the PY 3 requirement for the OHIC RBPO Certification Application.

We appreciate the opportunity to provide input on the draft Medicaid Program AE Roadmap for EOHHS' consideration. Integra looks forward to the final version of the AE Roadmap and our continued collaboration on this interdisciplinary, accountable system transformation approach to population health for Rhode Island Medicaid beneficiaries.