



# Lifespan

*Delivering health with care.*

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RE: 2019 Draft Policy Statements

Lifespan appreciates the opportunity to comment on the draft policy statements recently released by the Executive Office of Health and Human Services (EOHHS). Specifically, Lifespan's comments are regarding the policy statement concerning member assignment for Managed Care Organizations (MCOs) within the context of the implementation of Accountable Entities (AEs).

Lifespan fully supports the EOHHS objective of maintaining the beneficiary/provider relationship. This furtherance of a patient centric approach would allow providers to provide integrated care and to enhance patient safety. By allowing patients to remain with their chosen medical provider instead of being required to change providers when there has been a change in a business structure would be a transformative action for Medicaid that will help to improve health outcomes by ensuring a continuity of care. Importantly, Lifespan believes the significance of this policy statement is one that should translate to the entire Medicaid population beyond the self-imposed limitations of the AE program. Moreover, Lifespan believes that creating two different approaches, as this new policy only applies to the AE program, may further confusion within Medicaid generally, and, thus fully applying it would eliminate this possibility.

As Lifespan continues with the transition to value-based care and increasing risk, the issues around continuity of care by a patient's provider remain a hurdle to an integrated care network. Accordingly, instituting this policy throughout the Medicaid program will serve to not only benefit the AE program and its beneficiaries but also all Rhode Islanders being served by Medicaid.

Sincerely,



Daniel Moynihan

Vice President of Contracting & Payer Relations