

UnitedHealthcare Community Plan of Rhode Island 475 Kilvert Street Warwick, RI 02886

November 23, 2021

Jennifer Marsocci
Executive Office of Health and Human Services
3 West Road, Virks Building
Cranston, RI 02920
Submitted via email: jennifer.marsocci@ohhs.ri.gov

Re: LTSS APM Program Requirements

Dear Ms. Marsocci,

UnitedHealthcare would like to thank the Rhode Island Executive Health and Human Services for the opportunity to comment on their LTSS APM Program Requirements.

Long-term services and supports (LTSS) serve the most vulnerable populations in Medicaid, including elderly, physically disabled, individuals with intellectual and/or developmental disabilities (I/DD), and individuals who are dually eligible for Medicare and Medicaid. LTSS are critical tools in helping individuals stay in their homes and communities with independence and dignity, rather than unnecessarily or prematurely moving to institutional care. The sophistication required to care for such a diverse population, combined with a rapidly aging population, shrinking workforce, and unstable state budgets has led many states to move to managed long-term services and supports (MLTSS).

The COVID-19 public health emergency has exacerbated financial vulnerabilities for LTSS providers and other critical providers. States should establish a trajectory in which payment parity exists for targeted populations and providers to ensure their ability to build capacity.

UnitedHealthcare supports EOHHS efforts to keep members in the community which improves their quality of life and allows more interactions with friends and family. As addressed in the Program Requirements, Rhode Island will face challenges in the current environment, one of those being long term sustainability. In order to ensure long term success of the program, one of the bigger challenges Rhode Island and all states will face is a rate structure which will be able to attract a well-trained workforce. Without long term sustainable rates, the ability to attract and maintain a skilled workforce, could result in the inability to meet the demand for services.



We value the State's commitment to stakeholder engagement and look forward to continued collaboration. Should you have any questions or seek further information about the feedback provided, please do not hesitate to contact me by phone at (401) 732-7439 or email at pcooper@uhc.com.

Sincerely,

Patrice E. Cooper

Chief Executive Officer

Patrice C. Cooper

UnitedHealthcare Community Plan of Rhode Island