

Medicaid and CPC+

The communication below represents the position of the Administration as it pertains to Medicaid participation in CPC+. The Administration has carefully reviewed the Comprehensive Primary Care Plus (CPC) solicitation that has been released by CMS, and has decided that for the following reasons, Connecticut Medicaid will not submit a letter of intent:

- The Medicaid program, overall, is facing existential threats associated with proposals to radically re-structure its federal funding, both in present day and over time. The Governor has released a statement (please find attached) that details the anticipated human and fiscal impact of the proposed American Health Care Act. This arises to such a foundational set of concerns that the program must focus concerted efforts on illustrating the value of the current approach, modeling various impact scenarios, and mitigating harm to currently enrolled members.
- It is well documented that the \$6 b. Connecticut Medicaid program has achieved many gains since implementation of the Affordable Care Act. In addition to increasing access through eligibility expansion, the program has successfully incorporated diverse care delivery strategies (e.g. Person Centered Medical Homes, Intensive Care Management, health homes), has improved quality indicators and care experience, and has reduced per member per month costs by 1.9% over the four years since migration away from capitated managed care arrangements.
- Under the auspices of the State Innovation Model agenda, the Department of Social Services has just launched PCMH+, a first ever upside only, shared savings initiative for Connecticut Medicaid that explicitly builds upon key planks of the Department's reform agenda - Intensive Care Management and Person Centered Medical Homes. PCMH+ seeks to enable enhanced care coordination activities - notably, behavioral health integration - through both a value-based payment approach and connections with the community-based entities that have capacity to influence social determinants of health. Under PCMH+, participating FQHCs are receiving supplemental care coordination payments that they may use consistent with their own needs and priorities, which may include hiring of community health workers. Development and implementation of PCMH+ has represented a huge lift for the Department. Considerable resources must be brought to bear in overseeing the program and assessing its impact on people and their health and care experience outcomes. Further, it is the opinion of the Administration that this initiative merits time to mature before building in additional strategies.

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- The Administration, with the endorsement of the legislature, has invested significant financial and in-kind resources in Connecticut primary care practices. These include: 1) PCMH program enhanced fee-for-service payments that totaled almost \$6.6 m. in CY'16; 2) PCMH program incentive and year-over-year improvement payments that totaled over \$311,000 in CY'15; 3) EHR payments; and 4) in-kind multi-disciplinary practice transformation coaching through the medical Administrative Services Organization, CHNCT. Although it is conceivable that CMS would entertain conversion of a portion or all of the current payments to a bundled payment, that action would require a detailed review of whether this is in the interest of Medicaid members, careful conceptualization, stakeholder review and comment by the Medical Assistance Advisory Council, advance advisory discussion with CMS, and a formal State Plan Amendment process. Further, providers are currently in reliance on receiving these payments under the current terms, and revision may alter their continued willingness to participate. For the above stated reasons, the Department cannot focus its efforts on these actions.
- Finally, the Department is in process of rolling out other, complementary initiatives that will have direct benefit for primary care practices. Most significant among these are discussions with CMS in support of enabling specialists to directly bill for e-consults. Approval of the same will enable primary care practitioners to consult in real time. This is anticipated to help more conscientiously honor appropriate boundaries of the scope of care, reduce the need for follow-up visits, and minimize frustrating experiences with members who fail to participate in scheduled appointments.