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DIRECTOR

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Health Care Authority  
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RE: DSHS HCA Duals Design Plan Proposal

The following are the comments that Spokane County and Spokane County Community Services, Housing, and Community Development Department (CSHCD) would like to provide to the Health Care Authority (HCA) regarding the Pathways to Health: Medicare and Medicaid Integration in Washington State.

Strategy One: Health Homes

- Spokane County supports the concept of Health Homes and recommends that Health Plans in Spokane County collaborate and work with our Eastern Washington Regional Health Alliance community partners, which includes multiple counties in a regional area in order to thoughtfully develop Health Homes that meet the needs of the broader community.
- Careful consideration should be taken before HCA qualifies Health Homes in order to determine the number of Health Homes in our regional area.
- The implementation of Health Homes involves care management across the continuum of services that an individual requires. There have been concerns raised that this may be another layer of care management since many of the providers of services also provide care and/or case management.

Strategy Two: Full Integration Capitated financial model purchased through health plans (beginning January 1, 2013)

At this time Spokane County has concerns about the timeline and have determined that we need much more information and conversation due to the following unknowns:

- Rates, and actuarial processes and determinations are undefined
- Risks remain with Spokane County when some duals coverage would be transferred to Health Plans and some dual eligibles remain under the Regional Support Network (RSN). Would the remaining funding allocation to the RSN be adequate to pay for individuals requiring ongoing care?



- There would be difficulties if there are multiple health plans to work with.
- Each health plan contracts with local providers and RSNs may be different, increasing overall costs if rates, performance goals, and data reporting are unique to each health plan and each county's providers.
- Spokane County is in the process of merging counties in the North Central Washington Regional Support Network with the Spokane RSN. We cannot obligate additional risk to these counties without adequate information and involvement to determine if there will be sufficient funding to cover all eligibles and cost.

Strategy Three: Modernized and consolidated service delivery with shared outcomes and aligned financial incentives (beginning January 1, 2014)

Spokane County would like to better understand this proposal and look forward to additional discussions.

Overall Impression:

Spokane County supports improving the health of the community and ensuring that the individual is able to obtain support for making healthy choices in their lives. Developing and regularly monitoring the performance outcomes of each of the strategies outlined is crucial to determine if they are achieving positive outcomes. Are individuals accessing and receiving better and appropriate care? Are we reducing costs without reducing needed services in the communities?

Thank you for the opportunity to provide input and feedback. We have especially appreciated the HCA staff that has provided information ongoing to counties and RSNs.

Sincerely,



Christine Barada  
Director

jln

cc: Doug Porter  
Diane Wear  
MaryAnne Lindeblad  
Chris Imhoff  
Commissioner Todd Mielke  
Commissioner Al French  
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