



April 13, 2012

Duals Project Team

Washington Department of Social and Health Services/Aging and Disability Services Administration and the Health Care Authority

Duals@dshs.wa.gov

Re: Response to Request for Comments regarding the Draft Proposal for the Integration of Medicare and Medicaid for Dually Eligible Individuals

Coordinated Care Corporation and our parent company, Centene Corporation, applaud the State of Washington's participation in this initiative to integrate Medicare and Medicaid for dually eligible individuals. We are pleased to submit this response to the Washington Department of Social and Health Services/Aging and Disability Services Administration and Health Care Authority (DSHS/ADSA and HCA) Request for Comments to solicit information regarding the Draft Proposal for the Integration of Medicare and Medicaid for Dually Eligible Individuals.

Centene possesses over **28 years of experience in Medicaid and Medicaid-related managed care** programs for low-income populations, including Temporary Assistance for Needy Families (TANF), the State Children's Health Insurance Program (SCHIP), Supplemental Security Income (SSI)/Aged, Blind and Disabled (ABD), Foster Care, Long Term Care, subsidized and commercial health insurance for uninsured and Medicare (Special Needs Plans). We operate managed care programs in fourteen states: Arizona, Arkansas, Florida, Georgia, Illinois, Indiana, Kentucky, Louisiana, Massachusetts, Mississippi, Ohio, South Carolina, Texas and Wisconsin. In addition, Centene health plans operate Medicare (Special Needs Plans) in Arizona, Georgia, Ohio, Texas and Wisconsin. We were recently awarded a contract in Missouri and appreciate HCAs selection of Coordinated Care in Washington. Coordinated Care is positioned to provide fully integrated solutions to the state of Washington and our members through our specialty solutions, which include US Script (pharmacy benefit management), Cenpatico Behavioral Health, OptiCare (vision care), Nurtur (life and health management), and NurseWise (a nurse advice and medication treatment compliance line). Coordinated Care can offer a complete service package when it comes to integrating health care solutions that address the complex needs of the Dually Eligible population.

We have reviewed the draft proposal and support the approach outlined by DSHS/ADSA and HCA designing an approach to care that better aligns Medicare and Medicaid services through high intensity care management, integration of funding streams, technology and the delivery of services to reduce fragmentation and confusion among this highly vulnerable population.

We offer these additional recommendations for your consideration:

1. Simplify administrative burdens and streamline the integration of CMS and State requirements eliminating duplication and inefficiency through:
 - Uniform encounter reporting methods for CMS and the State
 - Unify enrollment with the State managing the enrollment and disenrollment into both Medicaid and Medicare programs



- Adopt grievances and appeals processes and criteria that leverage the existing Medicare requirements
 - Introduce a single set of quality performance measures that includes CMS and State requirements
2. The 1/1/2013 go live timeline is very compressed. We want to make sure there is sufficient opportunity for all stakeholders to work together and to put in place the right infrastructure for a successful demonstration program launch. We support comments made during the discussion on March 30, 2012 recommending a phased in approach spanning several months beginning January 2013, or concurrent with the State fiscal year beginning July 2013.
 3. To better serve the goal of continuity of care and maintain the stability of the risk pool, we recommend the State consider permitting members to switch plans on an annual basis, consistent with the current CMS protocol and perhaps allow mid-year switches only among plans participating in the demonstration to ensure that integrated Medicaid/Medicare coverage would be maintained.
 4. We request further information to better understand the proposed handling of the Medicaid wrap formulary and perhaps in a time frame that would allow us to understand the full implications of our Part D formulary submissions that are due to CMS by April 30.
 5. We request a premium setting process and system that is transparent and ensure that the rates are actuarially sound. We urge the State to consider additional rate stabilization and risk protection mechanisms such as establishing rate corridors and reinsurance mechanisms.

If you need further information regarding these recommendations, or wish to discuss the integration proposal please let me know. My contact information is provided.

Sincerely,

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