

April 13, 2012

Humana Comments on Washington's MME Demonstration Plan Proposal

On behalf of Humana, we share the following comments on the Design Proposal for the state of Washington's Medicare-Medicaid Alignment Demonstration Plan. We applaud the efforts that the state has made to enhance services and care provided to beneficiaries enrolled in both Medicaid and Medicare by integrating the financing and administration of these programs. We are committed to enhancing the long term health and well-being of the over 115,000 Medicare Medicaid Enrollees across the state that an integrated plan has the potential to support.

Over the course of our 50-year history, Humana has supported a broad array of public and private health care payers, including commercial employers, state governments, Medicare, Medicaid and the TRICARE program. With over 11 million medical members and 7 million specialty-benefit members, we are also one of the nation's largest Medicare Advantage contractors with approximately 2 million beneficiaries. In Medicaid, we provide coverage to over 600,000 enrollees through contracts with Florida and Puerto Rico. Additionally, Humana owns 300 medical centers and over 240 worksite medical facilities, and has a long tradition of serving seniors and individuals with special health care needs. Currently, Humana provides coverage to over 200,000 Medicare Medicaid Enrollees (MMEs), also known as "dual eligibles".

In Washington State, Humana currently covers over 93,000 Medicare Advantage & Prescription Drug Plan members across the state, including nearly 8,000 dual eligibles. We have formed critical partnerships with providers in the state, including in Clark, King, Snohomish, Pierce and Spokane counties. These provider relationships include quality and care coordination initiatives to improve health outcomes for our members. To meet the unique and intensive needs of the target population of this demonstration, we will look to our experience in complex care management with our D-SNP plans. Today, Humana offers such plans in 11 states and Puerto Rico, and coordinates Medicaid Wrap and Nursing Home Diversion services in Florida under contracts with the state Medicaid agencies. Humana is committed to the further expansion of these capabilities, including our existing Long Term Care management, in an effort to continue to provide outcome driven, high quality care to the residents of Washington, and to be an active partner with the state and CMS as we strive towards the best possible integrated model.

Through our experience providing care in both the Medicare and Medicaid programs we appreciate the significance of the opportunity to improve health outcomes through better coordination of care for beneficiaries that are enrolled in both Medicare and Medicaid. As you finalize the details of the Medicare Medicaid Alignment Demonstration Plan, we offer the following comments:

Plan Selection Process: We understand from your proposal that you will limit plan participation to existing Medicaid contractors. We encourage you to consider a health plan selection process that recognizes care management capabilities of health plans across the full spectrum of Medicare and Medicaid benefits, and does not limit to those plans currently contracting with the state under the Medicaid program.

'Strategy 3' Model: We support the further expansion of the integration program as described in 'Strategy 3' of the proposal, and believe that plans with established Medicare experience should be considered strong candidates. Humana encourages the state to utilize a selection process that allows open competition on both Medicare and Medicaid capabilities.

Quality: We support the establishment of quality measures to ensure that beneficiaries are receiving appropriate care and services, and appreciate the need to use a combination of Medicare and Medicaid measures in the integrated program. We recommend that you utilize the existing Medicare STAR rating system in combination with existing Medicaid measures. It will be important to assess the set of proposed measures from both programs and minimize overlap.

Thank you for your consideration of our comments. We look forward to working with you as you further develop this important initiative.

A handwritten signature in black ink, appearing to read "Oraida Roman", with a long horizontal flourish extending to the right.

Oraida Roman
Regional President - Intermountain
Humana Senior Products