



April 13, 2012

Bea Rector
Project Director
Aging and Disability Services Administration

Kathy Pickens-Rucker
Project Management Office Manager
Health Care Authority

Renee C. Fenton
Communications Manager
Aging and Disability Services Administration

Dear Ms. Rector, Ms. Pickens-Rucker and Ms. Fenton,

Planned Parenthood is a trusted provider of reproductive and preventive health care to more than 130,000 patients in the state (and over 23,000 Medicaid patients). Offering a full range of health care including life-savings cancer screenings, birth control, prevention and treatment of sexually transmitted infections, and breast health services, Planned Parenthood plays a crucial role in the public health community and can provide a unique perspective as Washington moves towards a more holistic approach to providing care under the Affordable Care Act. While we are excited about the opportunity for our state to improve the quality, coordination and cost-effectiveness of the Medicare and Medicaid systems, we do have some concerns about reproductive health care access under the current proposal.

The Medicare and Medicaid integration proposal identifies a health home as a central point of contact working with the beneficiary to coordinate across the full continuum of health services, including medical, mental health, substance use treatment and social health services. Reproductive health care and family planning services are not specifically included, even though they are particularly important for high-risk dual beneficiaries because an unintended pregnancy can be especially problematic – not to mention costly – for this population. As such these services should be specifically mentioned within the service connections that will be required of care coordinators and health care homes in order to adequately respond to the diversity of the population's needs.

The rule should also clearly articulate that any health care coordination system, such as a health care home, will be required to contract with all Medicaid eligible providers in their service areas identified in the federal Affordable Care Act (ACA) as Essential Community Providers. Not only does the ACA recognize the importance of Essential Community Providers, this connection is absolutely necessary to ensure network adequacy, ease of transition between plans as patients move on and off of Medicaid, and to resolve the issue that family planning providers frequently encounter today of patients seeking our services when we are out of their network. When a patient comes to us to get her birth control refilled, we can see her and meet that need immediately; with other providers she might have to wait weeks for her medication. Therefore it's important that the health care homes established under this proposal partner with Planned Parenthood, as we have a demonstrated history of effectively and efficiently providing specialized family planning services to patients with unique and challenging needs.

Additionally, we are deeply concerned about the confidentiality of dually eligible patients when seeking reproductive health services, and the way that requirements around coordination of care

may reduce their likelihood of seeking care. While we support the aim of coordinating care as thoroughly as possible between all of a patient's health care providers, we must ensure that a lack of confidentiality in such a system does not create barriers to patients seeking sensitive reproductive health care services. The fact of the matter, which we know from the patients who seek care in our clinics on a daily basis, is that sometimes a patient simply won't seek the birth control or STI test that they need if it means their primary care provider will find out. While we urge patients to talk to all of their providers about all of their health care needs, ultimately the patient, the health care system, and the Medicaid budget is best served when patients are assured that they can easily and confidentially access a full range of reproductive health care should they choose to do so.

Therefore we request that in health home settings where care is coordinated between different providers, beneficiaries will still be able to access reproductive health care that is kept confidential from their other health care providers if they wish, and that they be able to self-refer to reproductive health care without the compromised confidentiality and increased barriers that occur when referrals are required. Furthermore, as is our priority regarding all insurance companies in health care reform implementation, there must be safeguards in place to ensure that Estimation of Benefits forms aren't sent home when patients are seeking confidential care.

In summary, we ask that the Washington Health Care Authority consider the following before submitting its proposal to CMS:

- Include reproductive health care and family planning services in the full continuum of health services.
- Require health care homes created under this proposal to contract with all Medicaid eligible providers in their service areas that have been identified as Essential Community Providers.
- Ensure that patients can *confidentially* access a full range of reproductive health care.

We appreciate the opportunity to comment on this proposal, because we believe that including Planned Parenthood in this discussion helps meet the fundamental goals of the Duals Innovation Grant by improving quality and coordination of care, and fostering relationships with diverse groups of stakeholders. Furthermore, successful implementation of the health homes strategy calls for care coordination provided locally by an entity that already has established care relationships with the beneficiary.

Planned Parenthood is an important member of our health care community here in Washington State. We have developed vital relationships with our high-risk patients who come to us seeking the basic care and family planning services they need which we oftentimes hear are not accessible elsewhere. Finally, reproductive health care centers like Planned Parenthood are crucial to CMS's mission to reduce avoidable health care costs, because access to services like STI testing and treatment, cancer screenings, and family planning, yields a \$4:\$1 return on investment - a huge cost savings to the state.

Sincerely,

A handwritten signature in blue ink that reads "Elaine T. Rose". The signature is fluid and cursive, with the first name "Elaine" being the most prominent part.

Elaine Taylor Rose
CEO
Planned Parenthood Votes Northwest