



WISCONSIN LEGISLATURE

P.O. BOX 8952 • MADISON, WI 53708

April 22, 2016

Dear Senator Darling, Chair; Representative Nygren, Chair; Members of the Joint Committee on Finance:

We understand that per Act 55 the Joint Committee on Finance will soon vote on the Department of Health Services Concept Paper to design Family Care/IRIS 2.0. We have reviewed the Department's Concept Paper and are writing to provide feedback as you make this important decision.

Members of the Assembly Committee on Aging and Long-Term Care and other Republican legislators submitted a letter to Secretary Rhoades on December 18, 2015 regarding DHS plans for the upcoming waiver request. Our letter was constructed following an informational hearing by our Committee on November 18, 2015 in which we heard from various long-term care experts, including the State of Tennessee which has been developing a similar statewide Medicaid Managed Care model. I am including our November letter with this correspondence.

Secretary Rhoades responded to our letter on December 22, thanking us for our input and ensuring that the final Concept Paper would include a discussion of our proposals.

In our review of the 19-page Concept Paper we see many answers to our questions and concerns in addition to areas of clarification for the Department. As stated in our December 18 letter, of optimal concern has been the readiness of the system on day one to minimize disruption, improve health outcomes through holistic person-centered care, and proper implementation and coordination to protect taxpayers by slowing the growth of expenditures.

While the Concept Paper accomplishes many of these stated goals, the following questions remain relative to our previous letter:

Adequate Planning and Transition Strategies

- Quality measures outlined on Page 15 of the concept paper do not reference behavioral health supports integration. Behavioral health is a critical new component of the system and should be a priority to incorporate with quality. **How will the Department measure the quality of behavioral health supports?**

Engagement of Interested Persons

- The Concept Paper does a good job of ensuring consumer input by requiring consumer advisory councils at IHAs. **Will these advisory groups have access to IHA specific**

data on all quality and contract measures required by DHS and the authority to make recommendations to the IHA?

Enhanced Provision of Services in Home-based and Community-based Settings

- Page 15 of the final Concept Paper adds a reporting requirement regarding settings in which someone lives, as well as changes in settings. Guiding Principles on Page 7 also mention a person's right to live in the least restrictive setting. Reducing high cost institutional admissions should be a priority in the system. **How will reporting on settings translate to the specific requirements of IHAs to reduce costly institutional placements?**

Support for Eligible Individuals

- Informed consumer choice that drives competition requires robust information. Page 15 of the Concept Paper references use of an IHA and MCO scorecard available to the public. **Will all reportable information on quality measures and any benchmarks provided to the Department be made part of a public scorecard?**

Person-centered Processes Including an Option to Self-direct Services

- Our letter outlines concerns related to the implementation of employer and budget authority in self-direction. The Concept Paper includes only vague readiness provisions for self-direction on Page 11. **How will the Department require demonstrated ability and experience on behalf of an IHA to implement both employer and budget authority in full self-direction on day one?**

A Comprehensive and Integrated Service Package

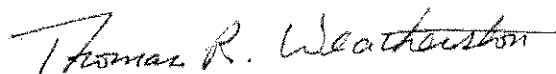
- Our letter suggests establishment of specific benchmarks in certain areas with one focus being the number of individuals employed in competitive integrated settings. The Concept Paper makes several general references to employment, but no mention of prioritizing improvement in competitive integrated employment, as has been a focus in other states. **How will the Department's focus on community employment be clarified to include benchmarks or other IHA expectations for improvement?**

Comprehensive Quality Assurance and Oversight Procedures

- Perhaps the main message from speakers in the November 18 hearing was the need for strong state oversight in new Medicaid Managed Care systems. The Concept Paper discusses reporting requirements on quality measures and on Page 11 and states that "DHS will provide oversight to ensure ongoing compliance". It is not clear how involved the Department will be. **Will Department oversight include setting of benchmarks across quality and service areas, onsite reviews of crucial processes and operating functions and monitoring to ensure services are delivered? What investments and changes to DHS contract administration will occur in order to ensure that the Department has the capacity to monitor quality and performance standards in order to reach policy and program goals?**

We are grateful for the opportunity to provide input on the DHS Concept Paper and to offer specific questions as you consider this significant system redesign. Thank you for your continued leadership on this issue.

Sincerely,



Rep. Thomas Weatherston

62nd Assembly District



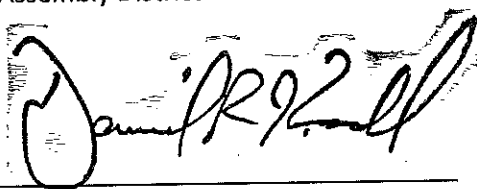
Rep. Romaine Quinn

75th Assembly District



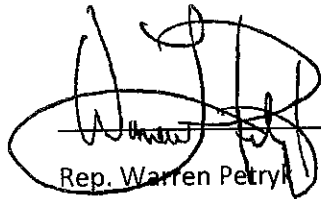
Rep. Kathy Bernier

68th Assembly District



Rep. Dan Knodl

24th Assembly District



Rep. Warren Petryk

93rd Assembly District