

Monday, December 20, 2021

To: Medicaid Advisory Committee
Attention: Co-Chair Leslee S. Huggins and Co-Chair Jeremiah Rigsby
C/O: Jackie Wetzel, Oregon Health Authority
Jackie.Wetzel@dhsosha.state.or.us
MAC.Info@dhsosha.state.or.us

From: Members from the Curry, Josephine/Douglas, and Jackson Community Advisory Councils of AllCare CCO
1701 NE 7th St
Grants Pass, OR 97526

Written public comment to the Medicaid Advisory Committee for the December 15th 2021 meeting --
RE: Draft Application for the 1115 Medicaid Waiver

Co-Chair Leslee S. Huggins, Co-Chair Jeremiah Rigsby and Members of the of Medicaid Advisory Councils,

We are members of the AllCare CCO's Community Advisory Councils. Our membership is made up of Members of the Oregon Health Plan, Community Benefit Organizations and other essential partners like County Public Health Departments.

AllCare CCO's Community Advisory Councils have been focused on community investment to improve the SDOH-E for over 7 years. Along with our work on our regions' Community Health Improvement Plans, our Councils have directed investments of over \$1.25 million to improve the health of the community. During this process we have worked with over 75 local community partners to fund programs, share expertise, and expand services. Most of these investments have been to improve the health of our community regardless of their insurance carrier or status.

The Councils have made wide-ranging, non-medical health related investments in education, housing, food security, personal safety, transportation, etc. Each of these investment has helped break down silos to work collaboratively to improve health in our community regardless of setting.

Our councils work in a collective process ensuring that our OHP member representatives have just as much of a voice as community partners.

While what we have accomplished has been positive, our Councils are limited to focus on giving out one year "grants" or pilot projects in large part because the Medicaid funding structure of CCOs mandated by CMS. With our years of experience engaging the community we have been looking for an opportunity to go beyond one year grants or pilot projects.

We saw the concept of HB 3353 as way to build on the community relationships we have built over the last 6+ years and move investments into sustainable, long-term projects that could truly transform communities. Our councils offered written letters of support highlighting specific projects that would likely benefit from this kind of flexibility. These suggestions made it into HB 3353.

Unfortunately the draft 1115 waiver has taken a different approach than what is written inside HB 3353. They are proposing siloing out dollars into a new, undefined entity with no specific geographic or membership make up. In the waiver the role of the CCO's Community Advisory Council to do oversight of these funds is not fully developed; rather the waiver looks to be in conflict with what was written in 3353.

We are also disappointed that our Community Advisory Councils were not engaged at a development level along with some other community interests. This is concerning because (by law) Community Advisory Councils are made up over 50% of Medicaid Members; voices critical for making sure the waiver is not creating unintended consequences for Oregon Health Plan members or the community.

We ask that the Oregon Health Authority take the path laid out inside HB 3353 to achieve equity goals. We supported HB 3353 because of the vital tenet of increased accountability, especially for traditionally underserved populations, of CCOs and Community Advisory Councils all across Oregon. We must elevate and empower more voices to achieve health equity - something we have been working achieve and will continue to do.

But an equally important tenet of 3353 was building on good parts of the near decade of work of breaking down silos and letting local communities make decisions about addressing the health needs of the community.

Our suggestion on a way to accomplish this would be to use these CICs, not to be different silos separate from the 99% of the budget, but rather a local group to hold CCOs and Community Advisory Councils accountable to ensure we are actually accomplishing our equity requirements and goals. Who better to grade local equity investments than our local communities?

We request that the Medicaid Advisory Committee ask that the Wavier be changed to support HB 3353 as written. We also further ask that as changes are made to the waiver that the OHA engage the Community Advisory Councils in their internal processes as with other stakeholders. Finally, we ask that the waiver make a clearer ask for flexibility and sustainability of these SDOH-E and equity efforts.

While we agree with OHA's goal of increasing community voices in decision making and oversight we don't believe that centralization and siloing for funds and efforts will accomplish these goals.

Sincerely,

Sandra Maxwell (Consumer), Vice-Chair of Josephine/So. Douglas Community Advisory Council
Chelsea Rosenberg (Consumer), Josephine/So. Douglas Community Advisory Council
Connie Dillinger, Josephine/So. Douglas Community Advisory Council
Victor Van Sickle (Consumer), Jackson Community Advisory Council
Wendy Lang, Curry Community Advisory Council
Sarah Kaplansky (Consumer), Chair of Curry Community Advisory Council
Leslie McIntyre (Consumer), Josephine/So. Douglas Community Advisory Council
Machell Carroll (Consumer), Curry Community Advisory Council
Leah Swanson, Emergency Preparedness Coordinator Josephine Public Health and Josephine/So. Douglas Community Advisory Council
Beth Barker-Hidalgo, (Consumer), Vice-Chair of Curry Community Advisory Council
Shawn Martinez, Juvenile Justice Prevention & Treatment Services Manager for Josephine County and Josephine/So. Douglas Community Advisory Council
Kevin Roeckl (Consumer), 5-year member of Curry Community Advisory Council
Don Bruland, 5-year member of Jackson Community Advisory Council
Alexandria Jones (Consumer), Jackson Community Advisory Council
Elizabeth Roth (Consumer), Chair of Josephine/So. Douglas Community Advisory Council
Linda Maxon, CEO Coast Community Health Center, member of Curry Community Advisory Council