



January 7, 2022

Health Policy and Analytics Medicaid Waiver Renewal Team
Attn: Michelle Hatfield
500 Summer St. NE, E65
Salem, OR 97301

Via email: 1115Waiver.Renewal@dhsosha.state.or.us

RE: 1115 Medicaid Waiver Submission

The Oregon Association of Hospitals and Health Systems (OAHHS) appreciates this chance to provide public comments on the 1115 Medicaid Waiver submission. OAHHS and its members have been supportive and integral partners in the development, implementation, and success of health system transformation since 2011. Oregon is and can continue to be a leader in how care is delivered for those eligible for the Oregon Health Plan through a local, community driven model that is foundational to how Oregon has been so successful to this point.

Following our comments in July 2021 after the release of the first draft concept papers, we believe a transparent, focused discussion on the 1115 waiver renewal helps identify successes and opportunities to prioritize what is most important in the next phase of Oregon's health system transformation to ensure our shared vision of better health, better care and lower costs – which we began with the initial formation of coordinated care organizations in 2012 – continues to meet the needs of our most vulnerable Oregonians.

In the early discussions and formation of CCOs and health system transformation, the collective work was grounded in extensive, transparent and robust public input and feedback. Through two legislative sessions, a large stakeholder workgroup, multiple technical workgroups and continued stakeholder support through the initial waiver process, we all worked together to produce the best outcome for Oregonians under a shared vision. That work of collaboration, input and constant feedback are critical now as Oregonians and the providers who serve them depend on the Oregon Health Plan more than ever.

The pandemic has highlighted the critical need for the Oregon Health Plan, especially for underserved and vulnerable populations. Doubling down on the path we set for ourselves almost 10 years ago requires we also double down on the commitment to each part we play in the health of Oregonians as hospitals, providers, CCOs, advocates, community-based organizations, policy makers and all who can and will contribute to the health of those served by the Oregon Health Plan. The following are some initial comments and questions.

Create opportunities to ensure operational feasibility and policy discussion.

Throughout the initial concept papers and continued through the final application, whether around the value based global budget or improving health outcomes, how OHA is viewing this policy and how the conversation continues with CMS creates challenges for hospitals and others in providing meaningful feedback about how to operationalize any new or changing policy. If the pandemic response has taught us one lesson over these last twenty-two months, operational expertise is critical – not just on the back end of a policy goal, but throughout the discussion to continue to ask the hard questions, understand the tradeoffs to policy choices and inform any other connected policy which may or may not be apparent to those who are developing the policy. This work is too important for serving Oregonians to not have the right expertise throughout the discussions - from hospitals to providers to CCOs to health equity

coalitions – to best provide real time input and a constant feedback loop to OHA and its team to continue to meet health system transformation goals. In addition to informing the product with the hope of making it better, continuing to connect policy and operations across varying functions of the system is equally important. We recommend connecting and will continue to advocate for OHA to work with operational and content experts throughout the wide range of areas covered by the waiver proposal through the continued waiver submission process and continued discussions with CMS.

Eligibility and enrollment process should reduce administrative burden and ensure those eligible remain on the Oregon Health Plan.

OAHHS has supported a fully funded, sustainable Oregon Health Plan and supports OHA's discussions to make strides to make the eligibility and enrollment process as streamlined as possible for OHP members, potential OHP members, and hospitals who may have a role in any expanded or new process. The focus of the state, providers, CCOs and others should be on ensuring seamless coverage for those eligible for the Oregon Health Plan. OAHHS supports policy and additional conversation to support these goals as long as we can continue to sustainably fund the Oregon Health Plan and the providers who serve those members, which needs to continue to be a priority for state leaders as more and more Oregonians depend on this critical program. As we have in the past, OAHHS will continue to advocate for sustainably funding the Oregon Health Plan without sacrificing funding hospitals, providers or CCOs, and continuing to fund organizations and providers who care for our most vulnerable.

Importance of the value-based global budget requires hospital and health system expertise during development and implementation.

Oregon's health system transformation was built towards a budget concept to integrate funding streams while providing local flexibility to meet outcomes for the member being served. While there continue to be challenges with this concept OHA needs to address, especially as we collectively work towards value-based payment and other alternative payment models that reward value and outcomes, OHA should continue to investigate opportunities with their federal partners for additional flexibility, while allowing full funding for the Oregon Health Plan to deliver on the outcomes. These approaches should also not come at the cost of increasing administrative burden or reducing resources for providers serving the Oregon Health Plan. Approaches should reward providers for outcomes and should not carve up an already limited budget to deliver the quality of care expected for the population being served. In addition, the health care system is under (and will be under for some time) enormous strain from the response and recovery of the pandemic. Any budget policy that intentionally or unintentionally has the effect of moving incentives or resources from the health care system could have the opposite effect on the outcomes the waiver is attempting to achieve. Innovation in this will take work with OHA, CCOs, hospitals and other providers who have technical expertise to understand both the data aspects and real-world implications of policy choices as OHA begins the conversations with their federal partners. The policy discussed in the waiver is novel and requires further discussion as it moves forward in negotiation with CMS and in any form it takes. Providers, hospitals, and stakeholders need to be at the table to implement policy and likely continue to discuss it to ensure its intended outcomes. Each discussion will have implications for Oregon Health Plan members and the hospitals and providers who serve them, so the sooner OHA can begin to understand these risk/reward and transparent discussions, the better throughout this process.

Focus on health equity.

We appreciate the focus on health equity and the work OHA has put forward. We continue to encourage the state to review their strategies around health equity so they encompass the full inclusivity of the state's own definition of health equity. As we reviewed the waiver about how OHA can address health equity through this process, we continue to have questions about how OHA is considering supporting this

work to ensure its success. How are the structures and programs designed and operationalized to not duplicate governance and maximize success, while continuing to support investments in the health care system to support health outcomes?

Thank you for the opportunity, and we will continue to provide feedback in writing and through OHA provided venues.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sean Kolmer', with a long horizontal flourish extending to the right.

Sean Kolmer
Senior Vice President of Policy & Strategy