

Oklahoma Health Care Authority



SoonerCare 1115(a) Research and Demonstration

Waiver Amendment Request

Amendment Request 2019-02

Project Number: 11-W00048/6

Submitted 6/3/2019

Section 1 Executive Summary

Oklahoma's single state Medicaid agency, the Oklahoma Health Care Authority (OHCA) operates a section 1115(a), of the Social Security Act, Research and Demonstration Waiver. The waiver authorizes the SoonerCare Choice and Insure Oklahoma (IO) demonstrations. On August 31, 2018, the Centers for Medicare and Medicaid Services (CMS) approved OHCA's request to extend Oklahoma's SoonerCare 1115(a) waiver. The current demonstration is approved for the period of August 31, 2018, through December 31, 2023.

The OHCA operates a managed care delivery system named SoonerCare Choice, which is a network of primary care case management providers. Effective 2010, OHCA was approved to initiate Health Access Networks (HANs) to support the patient-centered medical homes delivery system. The HANs are non-profit, administrative entities that work with providers to coordinate and improve the quality of care for SoonerCare members.

Section 2 Waiver Amendment Description and Goals

The state asks for an amendment to the waiver Special Terms and Conditions (STCs) with an effective date no later than October 1, 2019, as follows:

2.1 Remove language that is either duplicative or no longer applicable to Health Access Networks (HAN) duties from the approved Special Terms and Conditions (STCs) at **STC 40**. The paragraphs identified for removal are the following:

- b) Ensure patients access to all levels of care, including primary, outpatient, specialty, certain ancillary services, and acute inpatient care, within a community or across a broad spectrum of providers across a service region or the state;
- c) Submit a development plan to the state detailing how the network will reduce costs associated with the provision of health care services to SoonerCare enrollees, improve access to health care services, and enhance the quality and coordination of health care services to SoonerCare beneficiaries; and
- d) Offer core components of electronic medical records, improved access to specialty care, telemedicine, and expanded quality improvement strategies.

2.2 Additional language revisions are requested to update the Evaluation Section of the waiver. These are detailed in Section 9 of this amendment request.

Section 3 Waiver List

With this waiver amendment, no changes to the waiver list are requested.

Section 4 Expenditure Authority

With respect to expenditure authority, no changes are requested.

Section 5 Member Impact

These proposed changes to the STCs language will ensure that members continue to receive a full array of appropriate care coordination services that are grounded in

interventions that respect the member, address health literacy and are evidence-based. Further, the effectiveness of the HAN will continue to be examined in the waiver Evaluation Design and reporting as noted below.

Section 6 Budget Neutrality

Amending the language will not have any effect on budget neutrality for the 1115(a) demonstration waiver. The state proposes a modest increase in funding for HAN. Calendar Year 2020 is projected with an additional \$3 million in expenditures, and successive years are increased by 2.8 percent for growth and utilization as in the currently approved waiver. Please refer to the Budget Neutrality Worksheet, for additional documentation.

Section 7 Required Elements of Waiver Amendment Process

The OHCA has conducted an extensive and transparent public notice process for this waiver amendment in accordance with federal and state requirements. The public notice process begins with Tribal Consultation which invites our tribal partners to offer feedback over a 60-day period on the proposed waiver amendment. The in-person Tribal Consultation meeting, which also provided for call-in participation throughout the state, was held at OHCA at 11 a.m., Tuesday, March 5. At the consultation meeting, no participants had questions about the proposed HAN amendment. A general question was asked about the impact of all the proposed changes included on the agenda and the response was an invitation for the representatives of tribal governments and health systems to review and discuss this and give their feedback to OHCA. Additionally and pursuant to federal requirements, OHCA scheduled two public meetings for presentation of the proposed amendments as listed below.

Medical Advisory Committee
March 14, 2019
1:00 p.m.
Oklahoma Health Care Authority
Ed McFall Boardroom
4345 N. Lincoln Boulevard
Oklahoma City, Oklahoma

The Children's Health Group (TCHG) Quarterly Meeting
April 9, 2019
5:00 p.m.
OU Health Sciences Center Campus
Provost's Conference Room
#233 Bird Library
1105 N Stonewall Ave, Oklahoma City, OK 73117
Oklahoma City, Oklahoma

Any questions and responses or feedback received during the public comment period in which the draft waiver amendment is posted will be considered by OHCA, as well as submitted to CMS for its evaluation of the waiver amendment request.

Section 8 CHIP Allotment Worksheet

As CHIP funds are not used for HAN, the worksheet has not been modified.

Section 9 Monitoring and Evaluation of Waiver Amendment

The OHCA proposes to continue the currently approved monitoring and evaluation components identified in the STCs. The hypotheses and measures provided in the current evaluation design remain applicable with the following correction request of removing the word “pilot” from the reference to the program in the first paragraph in **STC 84. Evaluation of the Health Access Networks.**

In addition, the following paragraphs are requested as replacement language pursuant to the Evaluation Design that the State has submitted to CMS to address “analyses of the HANs effectiveness”:

- a. Impact on Costs: The implementation and expansion of the HANs will reduce costs associated with the provision of health care services to SoonerCare beneficiaries served by the HANs;
- b. Impact on Access: The implementation and expansion of the HANs will improve access to and the availability of health care services to SoonerCare beneficiaries served by the HANs;
- c. Impact on Quality and Coordination: The implementation and expansion of the HANs will improve the quality and coordination of health care services to SoonerCare beneficiaries served by the HANs, with specific focus on the populations at greatest risk, including those with multiple chronic illnesses; and
- d. Impact on PCMH Program: The implementation and expansion of the HANs will enhance the State's Patient Centered Medical Home program through an evaluation of PCP profiles that incorporates a review of utilization, disease guideline compliance and cost.

Section 10 Conclusion

OHCA proposes to continue to carry out its mission with its waiver programs, and particularly the HAN program.

Section 11 Attachments with submission

1. Tribal Consultation Documentation
2. Public Notice Documentation
3. 2019 Waiver Projects Currently Undergoing Application, Renewal, or Amendment
4. Medical Advisory Committee (MAC) Meeting
5. The Children's Health Group (TCHG) Quarterly Meeting
6. Public Website Blog Posting
7. SoonerCare Choice Budget Neutrality Worksheet
8. Standard CMS Financial Management Questions
9. Accessibility Report