

August 28, 2015

Rayva Virginkar
Health Insurance Specialist
Centers for Medicare & Medicaid Services
200 Independence Avenue SW
Washington, DC 20201

Dear Ms. Virginkar,

I am writing to express South Carolina's non-binding intent to extend the scheduled end date for its Medicare-Medicaid demonstration program by up to two years, pursuant to Mr. Engelhardt's letter of July 16, 2015, and subject to the required conversations and contract amendments between the Centers for Medicare and Medicaid Services, the South Carolina Department of Health and Human Services, and the participating Coordinated and Integrated Care Organizations. As evidence of our ongoing engagement with stakeholders, I enclosed letters of support from the participating plans.

Thank you for offering this opportunity.

Sincerely,



Christian L. Soura
Director

Enclosures

C: Tim Engelhardt, CMS
Paul T. Accardi, Absolute Total Care
Jay N. Powell, FirstChoice VIP Care Plus
Thomas Lindquist, Molina Healthcare of SC, Inc.
Robert M. Kerr, Advicare

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July 24, 2015

Christian Soura
South Carolina Department of Health and Human Services
P.O. Box 8206
Columbia, South Carolina 29202-8206

RE: Medicare-Medicaid Capitated Financial Alignment Demonstration

Mr. Soura:

This letter is in response to Teeshla Curtis's email of July 21, 2015 requesting feedback from each of the CICOs on the proposed extension of the Healthy Connections Prime program.

Absolute Total Care remains committed to partnering with South Carolinians in an effort to improve healthcare. As such, we support the extension of the Medicare-Medicaid Capitated Financial Alignment Demonstration.

We appreciate the opportunity to provide feedback. We feel the impact of this program will foster better health outcomes in our state.

Sincerely,

Paul Accardi
Plan President & CEO
Absolute Total Care

July 24, 2015

Via Email Only

Christian Soura
Director
South Carolina Department of Health & Human Services
P.O. Box 8206
Columbia, SC 29202-8206

RE: Extension of Integrated Care Demonstration for Healthy Connections Prime

Dear Director Soura,

First Choice VIP Care Plus by Select Health of South Carolina wholeheartedly supports the Healthy Connections Prime program and strongly encourages the Department to submit a letter of intent to CMS for a two year extension of South Carolina's integrated care dual eligible demonstration in response to the July 23, 2015 memorandum from the CMS Medicare-Medicaid Coordination office (MMCO).

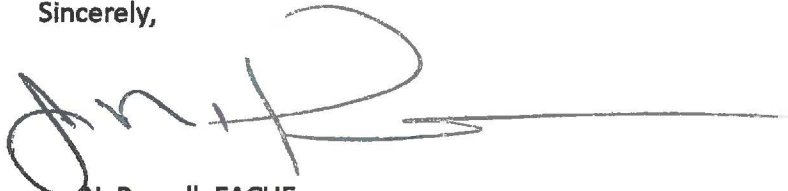
As one of the Department's four Coordinated and Integrated Care Organization (CICO) partners, our organization has demonstrated and remains committed to this integrated delivery system and payment model aimed at improving the quality, coordination, and cost-effectiveness of services for dual eligible individuals. Aside from the unforeseen program delays, the collective investments, hard work and collaboration by the Department, CICOs and other stakeholders have already shown great promise, and after only 5 short months since the February 1, 2015 Prime implementation, that this model of care can and will improve health outcomes, quality and reduce the cost of care for this fragile, underserved and complex dual eligible population here in South Carolina. Our work has just begun.

We see the State's option to extend the demonstration a real opportunity for the Department, CMS and CICOs to collect sufficient quantitative and qualitative data needed to evaluate and validate overall program effectiveness. We also support MMCO's belief that this change in end date will minimize the risk of beneficiary disruption and supports clearer decision-making in state budgeting while evaluators collect and analyze beneficiary outcome data.

Lastly, we acknowledge that the challenges and opportunities to improve access, quality and cost of care for the some of South Carolina's most complex and chronically ill individuals has not been without its difficulties. These were mostly expected as with any huge transformation. Rest assured, First Choice VIP Care Plus is ready to move forward with the Department, CMS

and other stakeholders towards the work at hand and to demonstrate over time that Prime achieves its intended program outcomes.

Sincerely,

A handwritten signature in black ink, appearing to read 'JP', with a long horizontal line extending to the right.

Jay N. Powell, FACHE
Vice President, Medicare-Medicaid Plans
SC MMP

cc: Teeshla Curtis
Mike Jernigan
Sharon Alexander
Rebecca Engelman



James H. Ritchie, Jr.
Executive Director

(803) 256-9003
www.scalliance.org

July 24, 2015

Via Email Only

Christian Soura

Director, South Carolina Department of Health & Human Services

P.O. Box 8206

Columbia, South Carolina 29202-8206

Re: Extension of Demonstration for Healthy Connections Prime

Dear Christian,

Absolute Total Care, AdviCare Advocate, First Choice VIP Care Plus and Molina Dual Options, the four health plans participating in Healthy Connections Prime ("Plans"), strongly encourage the Department to petition CMS for a two year extension of South Carolina's dual eligible demonstration project in response to Tim Engelhardt's memorandum of July 16, 2015.

Over the last four years, the State, CMS and the Plans have invested tremendously and collaborated extensively to develop a more efficient and effective system for serving South Carolina's dually eligible population. The Plans have and continue to allocate substantial resources toward provider network development, technology infrastructure and management expertise for this population. Unfortunately, this effort's complexities inevitably created delays, mostly around enrollment, leaving insufficient time to accurately test the demonstration.

Not extending the demonstration would prevent collection of data incorporating statistically sufficient enrollment to evaluate Prime's effectiveness. Prime will result in both better care for the State's most vulnerable and savings to the State's Medicaid budget, but the effort will be lost if we do not allocate sufficient time for the demonstration. We urge the Department to continue its work supporting Prime and preparing for passive enrollment.

Historically, health services for this vulnerable population have been disjointed, resulting in poorer health and often earlier-than-necessary transitions to institutional care. Developing true management of this population has not been quick or easy, but the Plans remain committed to Prime's purpose and success.

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Columbia, South Carolina 29201

Post Office Box 2573
Columbia, South Carolina 29202

Christian Soura
July 24, 2015
Page 2

Please do not hesitate to contact me with questions and concerns.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Lea B. Kerrison". The signature is fluid and cursive, with a large loop at the end.

Lea B. Kerrison
Director, Medicaid Services

cc: Teeshla Curtis
LBK



July 24, 2015

Christian L. Soura
Director
South Carolina Department of Health & Human Services (SCDHHS)

Via Email Only

Re: Dual – MMP Demonstration Extension

Dear Director Soura:

Thank you for the opportunity to provide feedback regarding the possible extension of the Medicare-Medicaid dual eligible demonstration. Advicare is writing in support of a two year extension to the end date of the demonstration.

The goals of Healthy Connections Prime are to improve health outcomes, delay the need for nursing facility care, reduce avoidable emergency department visits and hospital readmissions, and to increase access to home and community based services to some of the most vulnerable residents of South Carolina.

We believe the current members enrolled in Advicare, and the program at large, are getting much better and more coordinated care than ever before this program was launched. To that end, we believe that the Demonstration Program should be extended.

Advicare believes that the Healthy Connections Prime program will be continue to be of great benefit to even more people as the program develops. We strongly urge SCDHHS to extend the current demonstration program to a date two (2) full years past its current end-date.

We appreciate your attention to this matter.

Sincerely,

Cesar D. Martinez
President

cc: Teeshla Curtis

Jan Polatty

From: Nichole Melton-Mitchell
Sent: Friday, July 24, 2015 3:03 PM
To: Teeshla Curtis
Cc: Thomas Lindquist; Beverly Hamilton
Subject: RE: Healthy Connections Prime | Demonstration Extension Opportunity

Dear Teeshla,

We appreciate being asked for feedback regarding the opportunity for the state to submit a letter of intent to CMS regarding extension of the Healthy Connections Prime Duals Demonstration. Molina is committed to supporting the Department in the implementation and ongoing operation of Prime and stands ready to extend the program should SCDHHS elect pursue the extension.

Programs like Prime have a high level of complexity and are fraught with complications and delays, but we believe that the Prime model is a cost effective way to coordinate and integrate care and improve outcomes and overall health for this vulnerable population. However, if sufficient time is not allocated for Prime to achieve these objectives, the impact of the program will be diminished. The strides made in improving the overall health of this population will be lost and this will ultimately result in higher costs to the State. With this in mind, we encourage the SCDHHS to pursue an extension of the Demonstration to provide time to realize intended program outcomes.

Molina would be happy to discuss any questions or concerns that the Department may have regarding the implications or considerations of extending the Demonstration. Please do not hesitate to contact us.

Thank you,

Nichole Melton Mitchell
AVP, Government Contracts
Molina Healthcare South Carolina, Inc.
Toll Free 888.562.5442, ext 311742
Direct 843.740.1742

From: Teeshla Curtis [mailto:CURTIST@scdhhs.gov]
Sent: Tuesday, July 21, 2015 11:56 AM
To: ATC_MMP@centene.com; Cable, Courtney (ccable@advicarehealth.com); Jay Powell; Kathryn Gailey - Advicare; Kisha Price; Michelle Tindal ; Nichole Melton mitchell; Sharon Alexander - Select; sharonwilliams@centene.com; Talvin Herbert EXT; Wendy Bailey
Cc: Beverly Hamilton; Brynn King; Cesar Martinez - Advicare; Cindy Helling; Courtnay Thompson; Gailey Kathryn; Jay Powell; Julie Burton; Noah Paley; Paul Accardi; Kisha Price; Sharon Alexander - Select; Sidney Stone; Talvin Herbert EXT; Thomas Lindquist
Subject: Healthy Connections Prime | Demonstration Extension Opportunity

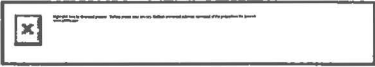
During the last few months, there have been a number of questions regarding the future of the demonstration. On Friday, July 17 participating demonstration states received a memo from the Medicare-Medicaid Coordination Office (MMCO) Director Tim Engelhardt announcing MMCO's intent to work with interested states to extend the scheduled end dates for each demonstration by two years. This memo can be found at the link below:

<http://www.cms.gov/Medicare-Medicaid-Coordination/Medicare-and-Medicaid-Coordination/Medicare-Medicaid-Coordination-Office/FinancialAlignmentInitiative/Downloads/FAExtensionMemo071615.pdf>

We would like to have your feedback as we are preparing our formal response. Please provide any feedback by close of business Friday, July 21.

Sincerely,

Teeshla Curtis
Program Manager
CURTIST@scdhhs.gov
803.898.0070
1801 Main Street
Columbia, SC - 29201
www.scdhhs.gov



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