



June 30, 2023

The Honorable Bill Cassidy, M.D.
United States Senate
219 Dirksen Senate Office Building
Washington, DC 20510

RE: Dual Eligible Legislation Discussion Draft

Dear Senator Cassidy,

On behalf of the Medicaid Health Plans of America (MHPA), we thank you for the opportunity to provide input on the discussion draft of legislation that that will serve as a starting point for the goal of better health care and outcomes for dually eligible Medicare and Medicaid beneficiaries.

MHPA is the only national trade association with a sole focus on Medicaid, representing more than 130 MCOs serving more than 52 million Medicaid beneficiaries in 40 states, the District of Columbia and Puerto Rico. MHPA's members include both for-profit and non-profit, national, regional, as well as single-state health plans that compete in the Medicaid market. Nearly three-quarters of all Medicaid beneficiaries receive health care through MCOs, and the Association provides research and advocacy services that support policy solutions to enhance the delivery and coordination of comprehensive, cost-effective, and quality health care for Medicaid beneficiaries.

As you know, we responded to the bipartisan request for information issued last November on improving care for individuals who are dually eligible for Medicare and Medicaid and, for ease of reference, [here is a link](#) to our response. We appreciate that our ideas helped guide the discussion draft and applaud your efforts to "provide true integration for this population that often struggles to get the care they need."

MHPA supports the delivery of care for individuals that are dually eligible that is coordinated, integrated, and aligned in the furtherance of quality care and better outcomes. We believe the intent of the discussion draft aligns with our position, particularly related to approaches that support access to care and services. However, we also believe that additional clarity would be helpful related to how these proposals would impact current approaches for meeting the needs of dually eligible individuals.

Access to Care & Administrative Efficiencies

MHPA supports efforts to ensure that individuals who are eligible for Medicaid, including dually eligible individuals, are able to apply for and retain coverage. We support the discussion draft's provisions for passive enrollment with an opt-out and the state option to allow continuous eligibility for an integrated plan for 12 months as important policies that facilitate access to care and services.

We also support the frailty adjustment factor for dually eligible individuals without requiring an integrated plan to demonstrate a high concentration of frail individuals. Dually eligible individuals experience high rates of chronic illness, with many having multiple chronic conditions and/or social risk factors, and this policy would minimize administrative burden and allow for greater efficiencies.

State Integrated Care Program for Dual Eligible Individuals

We appreciate that the State Integrated Care Program for Dual Eligible Individuals elevates the importance of integrated care for dually eligible individuals. However, we also note this as an entirely new program that does not build off existing infrastructures and policies currently in place in the states. For example, the draft discusses reducing the threshold for look-alike D-SNP plans under Medicare Advantage, but otherwise does not address how D-SNPs would be incorporated, if at all, into the new program. We express concern that the creation of an additional delivery system of dually eligible individuals would add complexity to a landscape that is already confusing for enrollees to navigate given the wide array of options available. To support stakeholder understanding and informed feedback, we recommend greater consideration and clarity for how existing models, infrastructures, and policies would be impacted by the new program as well as the impact on a state's flexibility to determine how best to meet the needs of the dually eligible individuals in their state.

Thank you for the opportunity to provide feedback on the discussion draft. Our member plans look forward to continuing to work with you in support of your efforts to improve care for dually eligible individuals.

Please feel free to reach out to me directly at sattanasio@mhpa.org with any questions or should you need any additional information.

Sincerely,

/s/

Shannon Attanasio
Vice President, Government Relations and Advocacy