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June 6, 2018

The Honorable Mandy Cohen, MD
Secretary, N.C. Department of Health and Human Services
2001 Mail Service Center
Raleigh, NC 27699-2001

RE: Supporting Provider Transition to Medicaid Managed Care

Dear Secretary Cohen:

Thank you once again for the opportunity to provide comments on the Department's implementation proposals relevant to Medicaid Managed Care, including *Supporting Provider Transition to Medicaid Managed Care*.

We applaud your strong focus on supporting practices, including independent practices, in the transition. We especially appreciate the explicit guidance on contract considerations and the role of Letters of Intent.

Payment adequacy now will undergird future success towards assuring that primary care is strong prior to the transition to managed care and in a position to withstand the buffeting winds of change, possible delayed payments, and other transition challenges. An effective strategy would be to allocate \$25 million to \$30 million out of the Medicaid rebase to increase primary care payments to be on parity with Medicare (pay at Medicare or Medicaid, whichever is higher). Thanks to the previous time-limited implementation of increased payment under the ACA bump, North Carolina already has this infrastructure in place. We urge NCDHHS to increase primary care payments beginning in SFY2019 to help providers prepare for the transition to Managed Care.

We also applaud the language that payments should be both prompt and accurate and that penalty payments should accrue to the practice without the practice needing to refile. We also appreciate the clear attention to administrative burden, specification of different sources of support (such as systems or Clinically Integrated Networks), and inclusion of the per member per month.

While we do have a few concerns, we have mostly raised them before. We would like to focus these comments on the need to increase primary care rates in SFY2019 to help providers enter transition in a strong position to adapt to changes.

Thank you again for your consideration of our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "St. Clair".

Scott St. Clair, MD, FAAP, Chapter President
North Carolina Pediatric Society (NCPeds)

Cc: Dave Richard, Dept. Sec for Medical Assistance, NCDHHS
Jay Ludlam, Asst. Sec. for Medicaid Transformation, NCDHHS
Matt Gross, Asst. Sec for Government Affairs, NCDHHS
Elizabeth Hudgins, Executive Director of the NC Pediatric Society