

BEFORE THE BOARD OF COMMISSIONERS OF LANE COUNTY, OREGON  
SITTING AS THE LANE COUNTY BOARD OF HEALTH

ORDER NO: 16-05-24-04

IN THE MATTER OF APPROVING SUBMISSION OF  
COMMENTS AND INPUT TO THE OREGON  
HEALTH AUTHORITY FOR CONSIDERATION IN  
CONJUNCTION WITH THE OREGON DRAFT  
HEALTHCARE DELIVERY WAIVER TO BE  
SUBMITTED TO THE CENTERS FOR MEDICARE  
AND MEDICAID SERVICES

**WHEREAS**, the Board of County Commissioners of Lane County has a stated interest in promoting the public's health and in continuing the excellent results achieved since the issuance of the 2012 federal healthcare model for Oregon; and

**WHEREAS**, the Board supports the Oregon Health Authority's goals of increasing healthcare integration, improving access, focusing on research-driven outcomes and controlling the increasing cost of healthcare services; and

**NOW, THEREFORE**, the Board of County Commissioners of Lane County **ORDERS** as follows:

1. That the Chair of the Board be authorized to submit the attached letter, to the Oregon Health Authority (OHA), providing comments and input related to the OHA submission of a request for a continued federal Medicaid Waiver.

**ADOPTED** this 24th day of May, 2016

APPROVED AS TO FORM  
Date 5/24/16  
\_\_\_\_\_  
LANE COUNTY OFFICE OF LEGAL COUNSEL

Faye Stewart  
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Faye Stewart, Chair  
Lane County Board of Commissioners



# LANE COUNTY BOARD OF COMMISSIONERS

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Jay Bozievich  
Pat Farr  
Sid Leiken  
Pete Sorenson  
Faye Hills Stewart

May 24, 2016

Lynne Saxton, Director  
Oregon Health Authority  
500 Summer St. NE E20  
Salem, OR 97301  
Submitted via Designated Email Address

Re: Application for OHP 1115 Demonstration Project

Dear Ms. Saxton:

On behalf of the Lane County Board of Commissioners, I appreciate the opportunity to provide comments on the most recent draft of Oregon's application for amendment and renewal of the Oregon Health Plan 1115 Demonstration Project to the Federal Centers for Medicare and Medicaid. As you know, the impacts of the Oregon Health Plan and the specifics of the demonstration project are felt most significantly by people living in local communities, and Lane County has been a strong partner in the current demonstration project with our local CCO Trillium Community Health Plans. We have a strong investment in the continued success of health care transformation in Oregon, and look forward to a continued partnership with your agency and many other local, state, and federal stakeholders.

There are several components of the application about which Lane County would like you to consider comments.

## **A. Improve Social Determinants of Health and Health Equity**

### **1. Coordinated Health Partnerships**

Lane County strongly supports the creation of this pilot program designed to support and strengthen locally designed solutions to improve outcomes for people who are frequent users of our emergency rooms and behavioral health crisis systems, who have multiple chronic conditions, and/or who are currently homeless or at risk of becoming homeless. In Lane County, these target populations are critically important to achieving true health care transformation, and the subject of significant local planning efforts to change systems and implement data-driven strategies to address specific needs. Support from the OHA and CMS for these local efforts will be tremendously helpful—both in the form of waiving current rules that are often barriers to coordinated care, as well as financial support for new interventions and solutions promises to make a significant difference. Our local health care, homeless/poverty, and public safety systems have long identified these barriers, and are eager to move this work forward in Lane County. In fact this focus on social determinants is one of two goals for the soon-to-be-released Community Health Improvement Plan, and an absolute key in improving health in Lane County.

Additionally, Lane County is very supportive of efforts to address disruptions in care when people enter and exit county correctional facilities and mental health institutions—as both the provider of the County jail, and the Community Mental Health Authority, we are keenly aware of the impact on local communities when these transitions are not appropriately coordinated and funded. The proposals in the waiver application should go a long way toward improving the ability of communities to impact recidivism rates and address the rising costs of health care.

## **2. Prenatal and Early Childhood/Nurse Home Visiting**

Lane County supports the expansion of Targeted Case Management (TCM) codes for nurse home visiting programs, as well as the decision to leave TCM out of managed care in the next waiver. In Lane County there is a strong partnership and coordination with the local CCO, which we would anticipate would continue. Lane County Public Health provides a strong Maternal Child Health Program, including recently expanded Maternity Case Management and Nurse Family Partnership and other state programs—important prevention programs that help our communities truly improve the health of the population. The ability to expand services provided, and appropriately capture data associated with those services is important to the ongoing effectiveness and sustainability of these programs. This structure supports an ongoing partnership between the County and the CCO.

### **B. Commit to the Sustainable Rate of Growth: Definition of Health Related Services**

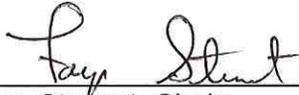
In Lane County, Trillium has been a strong supporter of prevention services since the CCOs were first created, allocating a PMPM to invest in prevention and population health services. These services include some direct, individual services (such as smoking cessation targeted at pregnant women) but also include evidence-based population health strategies (such as parenting programs or classroom management programs). This investment is important if the CCO is to achieve the Triple Aim. The current barrier to being able to include many of those services as health/medical has been very challenging, so Lane County is supportive of OHA's move away from "flexible services" to "health related services." However, the current description in the application is at odds with the intended goal of improving the social determinants of health. In the definition of "health related services" the application includes community benefit initiatives, but then narrows that to mean interventions to improve health care quality, such as investments in provider capacity and care management" (p. 39). If the goal is to truly impact the health of the community and achieve the Triple Aim, efforts must include those targeted beyond the health care delivery system (known to only be responsible for 10% to 20% of health outcomes). Lane County urges the OHA to provide a definition of community benefit that includes those population health strategies that demonstrated to impact the health of the community—it should not be equated with only health care quality, but should instead include the important work that public health and others are doing to address social determinants and improve the health of the population.

**C. Expand the Coordinated Care Model: Increase Health Care Workforce**

Lane County appreciates the inclusion in the waiver application of the issue of addressing the significant workforce issues in Oregon. As a provider of primary care and behavioral health services through our Community Health Center, we have directly experienced the challenges associated with recruiting and retaining both providers and other healthcare workers. The continued emphasis on this issue through both growing our own and strategies like loan repayment is critically important to the Lane County community.

Finally, the waiver application mentions the possibility of exploring with CMS the mechanism for using county intergovernmental transfers (p. 52). There is not detail around what that might include, so we are not in a position to comment specifically, other than to say that the County would ask to be engaged in those discussions with OHA early in the process to jointly identify opportunities. We have a long history of being strong partners in the community, and look forward to working together to identify strategies that will improve the health of people in Lane County.

Sincerely,



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Faye Stewart, Chair  
Lane County Board of Commissioners

5/24/2016

Date