*(Insert Date of Submission Here)*

**Texas Health and Human Services Commission**

**Attention: Basundhara Raychaudhuri**

**Via Email: basundhara.raychaudhuri@hhs.texas.gov**

**Re: Comments on Medical Care Advisory Committee (MCAC) Meeting - Healthy Texas Women 1115 Post Award Forum**

Dear Ms. Raychaudhuri,

On behalf of the *(Insert Name/Organization Name Here)*, thank you for this opportunity to provide feedback on the Medicaid section 1115(a) demonstration program entitled “Healthy Texas Women” (HTW).

*(Insert Paragraph Describing Your Organization Here - If Desired)*

We wish to make recommendations regarding the HTW program and encourage the state to consider them as we have now had several years to understand the impacts of the current waiver parameters. Since HTW’s launch in 2016, providers using the program have reported facing numerous logistical challenges on the ground - these include issues with the program’s application process and patient enrollment.

Please find our recommendations for the HTW program below:

1. **Request the addition of a Short Form Family Planning Only Application for women that wish to be enrolled in HTW and do not qualify for or are not interested in applying for Medicaid.**

*We continue to see issues with* the long-form MAGI application impeding timely enrollment, thus delaying access to care for Texas women. To ensure the accessibility of the HTW program’s crucial preventive health care services, we are asking HHSC to incorporate a short Medicaid Family Planning only application.

 Several other states have implemented a short form Medicaid Family Planning application in addition to the streamlined Medical Assistance application and we encourage Texas to examine these options now while the opportunity is present.

1. **Take steps to ensure network adequacy and provider credentialing when moving HTW into Managed Care.**

As of FY2022, there were just over 3000 Healthy Texas Women billing providers across the state. There are still vast areas of land with no providers, or less than 10 providers per county, including specialties and ambulatory services, making it hard or impossible for some women to obtain HTW care.

* We recommend that MCO contracts include a provision that requires them to have a consistent point of contact for HTW providers, and that this person be available for troubleshooting issues and billing questions.
* MCOs should have an expedited provider credentialing and enrollment process, as well as retroactive coverage, so that programs are not left to absorb costs for care while plans are reviewing their applications.
* As a part of MCO readiness and education activities, HHSC should offer every available opportunity to learn about state and federal family planning requirements including prior authorization policies before implementation of HTW into Managed Care.
* As part of the transition calls with MCOs, TWHC recommends the agency bring in women’s health stakeholders and women’s health providers.

*(Insert Name/Organization Name Here)*  recommends health plans proactively develop strategies to address current providers’ concerns related to: HTW application assistance, credentialing, the plan’s claims appeals process, and clear points of contact. To respond to concerns around contract enforcement, HHSC can proactively plan and share contract enforcement processes with providers and create escalation channels.

*(Insert Name/Organization Name Here)* also recommends considering the non-postpartum clients who will apply and enroll in the program without transitioning from Medicaid or CHIP. Clients who have no previous experience with managed care, may need assistance with navigating the managed care system, which could include application assistance and supportive service coordination.

*(Insert Name/Organization Name Here)*  appreciates the opportunity to weigh in on the HTW program. Thank you again to HHSC staff for their strong partnership and support. If you have any questions or if we can provide further information, feel free to contact me at *(Insert Contact Information Here)*.

Sincerely,

 *(Insert Name/Organization Name Here)*