

Per AHCCCS' request for public comment related to the merger between Centene/Arizona Complete Health ("AzCH") and Wellcare/Care 1st ("Care 1st"), Banner – University Health Plans ("BUHP") offers the following comments:

The Care 1st transition plan for the Central GSA indicates that Care 1st intends to transfer its membership to AzCH at the end of the "transition period," which is defined as 18 months after the close of the transaction. With respect to the transition of members in the Central GSA, BUHP encourages AHCCCS to ensure that members have choice with respect to their health plans. AHCCCS policy currently allows members annual enrollment choice (AEC) between the health plans in their GSA. However, the written transition plans do not acknowledge that members will be transitioned to a new plan outside of the AEC period. Similar to how AHCCCS has managed other transitions, we suggest that before any member is transitioned from Care 1st to AzCH that AHCCCS allow that member a special enrollment period during which they are able to select from any available plan in the GSA.

More generally, in addition to ensuring member voice and choice, we think it is important that AHCCCS carefully consider the feedback of providers in each GSA. Experience has shown that with large scale mergers and acquisitions it is often the providers that are hit the hardest. For that reason, we think it is important to ensure that providers are heard with respect to their concerns and that they are not negatively impacted by the acquisition. This may require close oversight by AHCCCS to ensure that transition to AzCH systems and processes does not cause providers to experience undue financial or administrative hardship.