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***Terros Health Public Comment on Change in Ownership Activities
September 19, 2019***

Thank you for the opportunity to comment on the proposed merger agreement between Centene Corporation and WellCare Health Plans and the proposed Transition Plan. Terros Health supports the intent of the merger to create a premier healthcare enterprise focused on a shared commitment to the local communities in which we serve.

Terros Health has had a long-term relationship with Arizona Complete Health-Complete Care Plan, and they have supported Terros Health's expansion of services in southern Arizona. We appreciate the ongoing opportunities to partner and contract with them for services with individuals and families.

Terros Health and Care1st AZ have also had an important and productive partnership over the years. We have experienced excellent leadership and success with Scott Cummings as CEO of Care1st AZ, which has benefitted our mutual patients with excellent care and health outcomes. Their employees are engaged and embrace change in processes and functions to simplify the administration of services. The responsiveness and collaboration of Care1st AZ employees is unique. Communication between Terros Health and Care1st AZ has been exceptional, leading to a true partnership. Care1st AZ is dependable at following the processes they have established for their organization and sharing and supporting providers in using those processes.

We encourage AHCCCS to leverage the strengths of Care1st AZ, including the streamlined processes and patient advocacy they have developed in their system. CEO Scott Cummings and his team have been consistently approachable, collaborative and engaged in both provider and patient relations. It would be our hope that Arizona Complete Health-Complete Care Plan would adopt much of the Care1st AZ organizational culture, staff and systems to enhance processes and operations across communities and service areas and to enhance Arizona Complete Health-Complete Care Plan's reputation.

***Comments on the GSA 1 Transition Plan
A. Administration and Management***

Following the closing, key staff positions for both the Care1st AZ and Arizona Complete Health-Complete Care Plan Medicaid contracts will remain the same in order to provide stability during the Transition Period. Care1st AZ's corporate structure will not change as a result of the Transaction.

Terros Health Comment:

We encourage that key Care1st AZ executive, management and liaison positions be retained beyond the Transition Period to preserve developed relationships, functions and systems of care.

C. Medical Management

At the time of closing and for the balance of the Transition Period, the pre-authorization function will continue in its current location and neither members nor providers will experience any change with this function.

Terros Health Comment:

Terros Health recommends that the Arizona Complete Health-Complete Care Plan formulary, service array and UM practices incorporate the established practices of Care1st AZ.

D. Behavioral Health

The current behavioral health programs will remain in place at the closing of the Transaction in order to eliminate any disruptions to our members and behavioral health providers. This is particularly important given the changes for behavioral health providers with the rollout of the Complete Care program across seven plans in the Central GSA. Both Arizona Complete Health-Complete Care Plan and Care1st AZ will communicate with the Council of Human Services Providers and individual behavioral health providers to gather their feedback to inform the long-term planning.

Terros Health Comment:

Terros Health, as a member of the Arizona Council of Human Services Providers, looks forward to actively participating in the long-term planning for behavioral health programs for the post transition period.

F. EPSDT (Early and Periodic Screening, Diagnostic, and Treatment) and Maternal and Child Health

The current EPSDT and Maternal and Child Health programs will remain intact following the closing. Arizona Complete Health-Complete Care Plan and Care1st AZ will evaluate EPSDT processes and programs in the initial months of the Transition Period to identify best practices for the Central GSA. Collaboratively, we are looking at EPSDT and Maternal and Child Health to ensure all decisions made are in the best interest of our members.

Terros Health Comment:

Terros Health medical providers, nursing staff and Medical Assistants recently participated in an education session in EPSDT through another health plan. It was comprehensive and very useful for establishing protocols for patient care. We would welcome Arizona Complete Health-Complete Care Plan developing a strong and effective system for testing and screening in the areas outlined in the proposed Transition Plan.

H. Management Information Systems

Care1st AZ will continue to operate on the same information system, including claims systems, at the time of the closing and through the Transition Period. Centene will leverage its approach to Functional Migration, which includes a combination of data and system migration, to transition the Care1st AZ business at the point of the membership transition at the end of the Transition Period.

Terros Health Comment:

During the merger between HealthNet and Centene there were glitches in timely and accurate claims payment and adjudication due to a change in finance platforms that was not optimally executed. Care1st AZ has an established platform in which providers are reimbursed in a steady, timely way. We recommend that Arizona Complete Health-Complete Care Plan retain and utilize the Care1st AZ model of Management Information Systems for all six of the components outlined in the MIS plan. Care1st AZ has maintained immaculate data for provider credentialing, contracting, member rosters, and Care and Utilization management. Care 1st AZ provides responsive, patient and provider focused, high quality care and customer service. Terros Health recommends utilizing Care1st AZ systems for both Care1st AZ and Arizona Complete Health-Complete Care Plan platforms. Should this not be possible, then we'd recommend implementing the protocols, quality assurance and customer service standards that Care1st AZ has delivered.

J. Encounter Reinsurance

There will be no change in the submission of encounters for Care1st AZ at the time of the closing. As with other processes, the initial months of the Transition Period will be spent in evaluation of processes to determine best practices in encounter submission, including the reinsurance process.

Terros Health Comment:

During the evaluation to determine best practices in encounter submissions, we encourage establishing methods to mitigate reimbursement process slow down with a new platform. Provider cash stream must remain uninterrupted to maintain high quality patient care. The Care1st AZ system set ups, mitigation of issues, processes, and high level of collaboration should be adopted across both companies.

K. Member Services

Terros Health Comment:

The Transition Planning for Member Services, including the Call Center, Member Handbook and Communication Plan appears comprehensive and consistent with the goal of minimizing member and provider disruption.

d. Any changes to administration of critical components of organization, including but not limited to information systems, prior authorization, claims processing, or grievances.

Terros Health Comment:

Terros Health would like to see the utilization management, prior authorization and Title 36 systems developed by Care1st AZ adopted. Providers would prefer to reduce burdensome and frequent documentation, data and reporting transfers. Terros Health supports Arizona Complete Health-Complete Care Plan's intent to enhance proven medical management and quality programs, including maternal and child-care programs to further enhance member experience and outcomes.

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