



TUBA CITY REGIONAL HEALTH CARE CORPORATION

167 North Main Street, P.O. Box 600
Tuba City, Arizona 86045-0600
(928) 283.2501

Thomas Betlach
AHCCCS Director
801 E. Jefferson St., MD-4100
Phoenix, AZ 85034

Bonnie Talakte,
AHCCCS Tribal Liaison
801 E. Jefferson St., MD-4100
Phoenix, AZ 85034
Or Bonnie.talakte@azahcccs.gov

RE: Tuba City Regional Health Care Corporation (TCRHCC) Public Comments on the Revised American Indian Medical Home (AIMH) Section of the 1115 Waiver Proposal

TCRHCC has been very involved in the AIMH workgroup. TCRHCC will meet all criteria for the AIMH criteria in the waiver proposal by the fourth quarter of FY17. As a Title V Tribal 638 healthcare provider, TCRHCC provides case management functions including care coordination for our patients. This includes coordinating with other I.H.S./638 and non-I.H.S./638 providers and receiving timely notification when patients are in need of care coordination services. At this time AHCCCS **does not provide** reimbursement for a 24 patient call line or case management services and we strongly support the approval of a PMPM rate for I/T/Us that meet the Medical Home criteria. TCRHCC has concerns about **non-I/T/Us** also qualifying for reimbursement under this program under the shared savings payment. Currently, TCRHCC employs its own employees whose salaries are paid with healthcare facilities revenue to coordinate and manage care. TCRHCC would like further clarification from AHCCCS on the proposed shared savings payment to **non-I/T/U** facilities. To the extent that a **non-I/T/U** facility does care coordination for AI/AN on its own, TCRHCC believes they should meet the same metrics as the I/T/Us. While AHCCCS expects that the proposal will necessitate a close working relationship between I/T/Us and **non-I/T/Us**, it does not indicate how the **non-I/T/Us** will communicate back to the I/T/Us that meet the medical home criteria. This appears to be only addressed in the *optional* Medical Home "*Plus*" criteria of participation in the state Health Information Exchange, Care Coordination Agreements, and regional Care Management Collaborative'. TCRHCC has concerns about the Medical Home "*Plus*" Care Management Collaborative participation, oversight, and outcome measures and would like to be engaged in the further development of this.

Tuba City Regional Health Care (TCRHCC) is pleased AHCCCS sought Tribal consultation and input for these sections of the 1115 waiver demonstration through the tribal workgroups.

TCRHCC, like many other tribes that have compacted I.H.S. healthcare services, have adopted more modern reporting programs, (TCRHCC will implement ALLSCRIPTS Electronic Health Record), and the proposed AIMH criteria **should be flexible** enough to allow reporting using more than one Electronic Health Record reporting system.

Sincerely,

A handwritten signature in black ink that reads "Lynette Bonar". The signature is fluid and cursive.

Lynette Bonar, RN, MBA, BSN
Chief Executive Officer, TCRHCC

Cc: T. Betlach
Bonnie Talakte