

---

## Comments on AHCCCS health plan merger

1 message

---

**Glassgow** <director@aznma.org>

Fri, Sep 20, 2019 at 11:51 AM

To: Centene-WellCareMerger@azahcccs.gov

The Arizona Naturopathic Medical Association (AzNMA) submits these comments on the proposed merger agreement between Centene Corporation and WellCare Health Plans, under which Centene will acquire WellCare. These comments are specifically directed to the impact of the proposed merger on two AHCCCS contracted health plans--Arizona Complete Health-Complete Care Plan (Complete) and Care1st Health Plan of Arizona (Care1st) and the proposed transition plans and other materials submitted by both health plans. AzNMA is a professional association representing the interests of licensed naturopathic physicians (NDs) in the State of Arizona.

At the outset, AzNMA would note that it is at something of a disadvantage in preparing these comments, since naturopathic physician services for EPSDT members have only recently been authorized by AHCCCS, and there do not currently appear to be any contracted yet with health plans. So, these comments are based on AzNMA goals as part of the health plan negotiation process rather than direct experience.

AzNMA has comments in three main areas. First, the proposal to transfer all Care1st members in the Central GSA to Complete raises some concerns. AzNMA would want to know the types of contracted providers for both health plans in this GSA to determine whether there will be a problem with access to naturopathic services. And it would be very helpful to have some comparison of how services are provided by each plan. Therefore, AzNMA recommends that this action be delayed for at least 18 months to allow for further research and comment before all members are assigned to just one plan (including whether, if so, it should be Care1st rather than Complete).

Second, AzNMA has concerns about the proposed handling of the South and North GSAs, where it seems that the merged entities are being allowed to decide what is the best way to provide services in these GSAs. AzNMA would prefer that AHCCCS do a complete review of this concept, including whether having a single statewide service area, or redetermining the service areas, would be appropriate. AzNMA therefore would request that this issue be reconsidered with an opportunity for further comment by any interested parties.

Third, the indication in several of the documents that no significant changes are anticipated as of the time the merger transaction is closed, but may occur later (apparently up to the end of the contracts in 2025), makes it very difficult for AzNMA, which is just beginning the process of working with the health plans on naturopathic services, to view these comments as fully developed rather than preliminary. AzNMA therefore requests that AHCCCS schedule additional comment periods over time, and it reserves the right to challenge actions that may occur later--in short, AHCCCS should include some stipulations for further review and comment in any approval or transition plan.

Thank you for the opportunity to submit these comments.

Baron

*Baron Glassgow  
Executive Director  
Arizona Naturopathic Medical Association  
6501 E. Greenway Pkwy. #103-404  
Scottsdale, AZ 85254  
Phone: 480-921-3088  
Fax: 888-430-7530  
director@aznma.org  
www.aznma.org*