



## Iowa Behavioral Health Association



**TRAINING RESOURCES**  
A Division of Iowa Behavioral Health Association

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To: MH/DS Commission  
From: Flora A. Schmidt, Executive Director  
Date: January 18, 2018  
Re: Integrated Health Homes

On behalf of the Iowa Behavioral Health Association and our membership, representing the substance use disorder and addiction treatment programs, community mental health centers, and problem gambling services programs throughout the state of Iowa, I am writing to express our concerns regarding the forthcoming changes to the Integrated Health Homes.

On Tuesday, January 9, 2018, IBHA and several of our IHH facilities spent the day at the Capitol meeting with nearly 2 dozen representatives and senators to express our concerns. Additionally, we have talked with representatives of the ACO network and they are not ready for, nor interested in this change, despite what UnitedHealthcare may be telling you.

We asked our elected officials to please not allow UnitedHealthcare to continue to contend this is being done solely to prevent duplication as their recently released FAQ indicates otherwise and that the real problem rests with the state. We find it interesting that UnitedHealthcare is commended for taking on all the members from the departed AmeriHealth Caritas including this high-needs population, that coincidentally UnitedHealthcare previously had strayed away from when first entering the Iowa managed care market. And now less than 60 days later, they are working to completely dismantle the LTSS and IHH services, albeit at the same time that Amerigroup is not yet up to capacity and unable to accept any of these Medicaid members.

Despite the challenges and missteps that accompanied the change to multiple MCOs, the Integrated Health Homes were actually starting to work as they were designed, they are helping individuals within the community setting, and they are reducing emergency department visits. Now, this is essentially being undone, leaving the Medicaid community with no option of choice and it will be these Medicaid members and those who support them, who are going to suffer the consequences.

With all due respect, our providers continue to be held accountable to the CMS requirements of the state plan amendment (SPA) and their MCO contracts. We should not allow DHS and UnitedHealthcare to operate under a different set of guidelines. By allowing this non-compliance of the SPA it is also enabling UnitedHealthcare to become "too big to fail" and at the same time handcuffing the state as Iowa's only Medicaid option.

IBHA remains adamant that a legislative fix is needed immediately and we asked the legislature to put a stop to UnitedHealthcare's plan.

Additionally, we suggest that the MH/DS Regions and their staff be prepared for a potential cost shift to the Regions along with an influx of Medicaid members who previously received care coordination services via the IHHs who will now be looking to other resources, like the Regions to assist them.