



## **SOUTHEAST IOWA LINK (SEIL)**

### **MENTAL HEALTH AND DISABILITY SERVICES REGION**

**DES MOINES, HENRY, JEFFERSON,  
KEOKUK, LEE, LOUISA, VAN BUREN  
& WASHINGTON COUNTIES**

January 10, 2018

MHDS Commission Members:

The Southeast Iowa Link Region (SEIL) would like to express our concerns regarding the internalization of care coordination to the Managed Care Organizations (MCOs) as allowed for in the amended contract with the Department of Human Services. Integrated Health Home (IHH) services with contracted providers is related to the integration of mental health services with medical health services and is operationalized via population health mechanisms and funding structures. To strip this service, in whole or in part, from the local service array undermines the efforts of mental health parity, need based service, and access to additional resources in an individual's community that can facilitate better outcomes for individuals served.

IHH is key in acquiring the Habilitation service array which is instrumental in offering individuals in need of community support the assistance required to maintaining their residence and life in the community of their choice. IHH service providers are the conflict free means to assisting individuals in need as related to their mental health treatment and as a support/advocate to the insurance funding source. The IHH provider care coordinators work directly with their clients, offer access to their clients in the communities of individuals, and facilitate the communication of relevant information to the MCO funding source so that individuals are treated based on their level of care need and in a person centered methodology. Without this service in whole or part, barriers to access of service(s) and conflict in decision making/funding abound. The MCOs will only become aware of individuals as a result of reactionary response to a heightened level of care because there is no local access to the MCO care coordination system to pursue preventative service/guidance. Furthermore, the MCO will complete the Inter-RAI assessment to determine level of care need, create the care plan/individual treatment plan, authorize service only related to their created care plan/treatment plan, hold/maintain the treatment plan in the MCO EHR system, and issue payment for service as the MCO deems appropriate.

SEIL respectfully requests that IHH services at the local level remain intact and the guidance to the MCOs is a process that reflects patient care as primary, conflict free, and transparent utilization of government allocated funds. Cost containment strategies can continue through such a process but with checks and balances to the process and greater attention to the needs of Medicaid eligibles.

Thank you for your attention to our concerns and any assistance you can provide in assuring local conflict free care coordination through Iowa's established Integrated Health Home providers.

Respectfully,  
Southeast Iowa Link Region  
Governing Board

Cc  
DHS Executive Director Jerry Foxhoven

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