

Summary of Public Comment and Responses
Draft Pass 1 Regional Health Plan (RHP 1)

Preamble: *In accordance with the requirements of the 1115 demonstration waiver, the University of Texas Health Science Center at Tyler, as Anchor for Region 1, posted the draft Pass 1 regional health plan for public comment from November 5 – November 9. Interested parties could comment two ways: (1) completing a public comment form available with the online posting of the draft Pass 1 regional health plan or (2) attending the public hearing held on Friday, November 9, 2012. The following public comments were received regarding the draft Pass 1 regional health plan. Each comment is followed with a response from the Anchor of the regional healthcare partnership. Comments and responses were sent to the individual public commenter, distributed to regional healthcare partnership stakeholders for their consideration, and posted online at www.uthct.edu/waiver. For information regarding these public comments or the responses, please contact Daniel Deslatte at 903-877-5077 or at daniel.deslatte@uthct.edu.*

Comment 1.1: “As a Federally Qualified Health Center based in Longview, TX, Wellness Pointe’s administration does not support the adoption of the Pass 1 proposal as written. We strongly encourage the inclusion of all regional FQHCs in the development of these regional strategies moving forward. Despite repeated attempts by this administration to partner with hospitals and intergovernmental transfer entities, regrettably, none were willing to include us in the development of their initiative plans. Thus, the largest FQHC in east Texas remains absent from the proposed plans. Given the profound, Federally-supported impact that FQHCs play in the Texas health care delivery system, we would respectfully request that no regional plan be accepted in which it has not been validated that such plans have been developed with the full support and inclusion of existing regional FQHCs.”

Response 1.1: Delivery system reform projects developed under the 1115 demonstration waiver must be implemented by an approved performing provider. Performing providers are primarily hospitals, but can also include community mental health centers, academic medical centers, or local public health departments. Because Federally Qualified Health Centers (FQHC) are not approved performing providers under the 1115 demonstration waiver, FQHC participation in the waiver is limited to collaborations with approved performing providers. Performing providers are encouraged to work with interested partners, including FQHCs, but the final decision on the nature, scope, and partnerships involved in projects rests with the performing provider. At least two performing providers in Region 1 submitted projects for Pass 1 that include partnerships with an FQHC.

Comment 1.2: “I received notice of Pass I on November 8, 2012, as a part of email on November 8, 2012. The due date for comment is today, November 9, 2012. Considering the immense size of the document and other work related duties, I have barely had time to look over the 770 pages of the document. I am not sure why this was sent to Emergency Management Coordinators, and I am not sure if EMC’s were expected to forward for public consumption, or if we are expected to supply input. I was unable to open links within the email, and ultimately, the document was sent to me as a separate attachment. Based on what I have seen, this looks like a four year cooperative plan, to include all health related stakeholders in the named counties. I do not understand the \$\$ amounts allocated, or how the number of resources were identified. This is a lengthy, confusing document.”

Response 1.2: The draft Pass 1 regional health plan was posted for public comment online on November 5, emailed to a database of regional stakeholders, and distributed by the Regional Director of Region 4/5N for the Department of State Health Services. Recipients were encouraged to forward the proposal to other interested parties. In addition, notice of a public hearing was posted in newspapers in Region 1. The details of the 1115 demonstration waiver are complicated, and the Anchor will reach out to this public stakeholder and answer questions regarding the regional health plan.