



June 30, 2018

MO HealthNet Division  
615 Howerton Ct., 2nd Floor  
Jefferson City, MO 65109

RE: Public Comment for Prospective MO HealthNet Managed Care Reimbursement Methodology:

The St. Louis Regional Health Commission (RHC) (see attached roster) respectfully opposes the State's proposed actions to change the methodology by which the MO HealthNet Managed Care Health Plans reimburse for non-participating providers. Specifically, the RHC opposes the change in which MO HealthNet Managed Care Health Plans shall reimburse non-participating providers 90% of the MO HealthNet Fee-for-Service fee schedule rate effective on the date the service was provided. Please note all Commissioners have voted to support this RHC action, with two abstentions due to conflict-of-interest considerations (Corsi, Tidball).

The Commission's mission is to improve access to health care, reduce health disparities, and improve health outcomes in the St. Louis region. Various individuals and organizations are represented in our membership, including: the Governor of Missouri (*representatives abstain in this action, as noted*), the Mayor of the City of St. Louis, the St. Louis County Executive, CEOs of area hospitals and community health centers, area medical school deans, leaders of neighborhood and faith-based organizations, local representatives of elected Federal officials (*non-voting*), health care advocates, concerned community members, and patients of our health care system. In addition to the eighteen-member appointed Commission, the Commission has two thirty-member advisory boards. One advisory board represents community organizations, citizens and users of the safety net system, and the other consists of health service providers in the region.

As the collective voice for the medically underserved and low-income population in St. Louis, we have joined together to voice objection to this change in MO HealthNet policy. By de-facto reducing the Medicaid rates our safety-net health care institutions will receive, our low-income patients will face additional barriers and limitations to accessing the medical care they need to maintain healthy and productive lives in our community. Representatives from hospitals in our urban core (as well as our counterparts in Kansas City) have commented on the "disastrous" effect such reimbursement cuts will have on their ability to continue to provide service to those most in need in our community. We therefore respectfully ask reconsideration of this policy, or, if implemented, a reversal as soon as possible.

We thank you for the ongoing partnership between the State and the RHC to preserve our safety net in our region, and for the opportunity to provide our comments to you regarding this proposed action.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Robert Fruend, Jr.', is written over a light blue horizontal line.

Robert Fruend, Jr.  
Chief Executive Officer



## Commission Roster as of June 30, 2018

**Cheryl Walker, JD** (Chair)  
*Attorney*  
Riley Safer Holmes & Cancila LLP

**Susan Trautman** (Vice Chair)  
*Executive Director*  
The Great Rivers Greenway District

**Jeffery Johnston** (Treasurer)  
*President*  
Mercy Hospital St. Louis

**Joe Yancey** (Chair, Community  
Advisory Board)  
*Executive Director*  
Places for People

**Fred W. Rottnek, MD, MACHM** (Chair,  
Provider Services Advisory Board)  
*Professor, Director of Family and  
Community Medicine*  
St. Louis University

**James P. Crane, MD** (Chair, "Gateway"  
Pilot Planning Team)  
*Associate Vice Chancellor for  
Special Projects*  
Washington University in St. Louis  
School of Medicine

**James Buford**  
*Civic Leader*

**Angela Clabon**  
*Chief Executive Officer*  
CareSTL Health

**Steve Corsi, Psy.D.**  
*Director, Department of Social Services*  
State of Missouri

**Alan Freeman**  
*President & Chief Executive Officer*  
Affinia Healthcare

**Candace Jennings**  
*Regional President – Hospital Operations*  
SSM Health – St. Louis

**Faisal Khan, MBBS, MPH**  
*Director*  
St. Louis County Public Health Department

**Rich Liekweg**  
*President & Chief Executive Officer*  
BJC HealthCare

**Melba Moore**  
*Acting Director*  
Department of Health, St. Louis City

**Will Ross, MD**  
*Associate Dean and Director of the Office  
of Diversity*  
Washington University in St. Louis  
School of Medicine

**Jennifer Tidball**  
*Deputy Director, Department of Social  
Services and Acting Director,  
MO HealthNet (Medicaid)*  
State of Missouri

**Ronald Watermon**  
*Vice President of Communications*  
St. Louis Cardinals

**Robert Freund, Jr.**  
*(Ex Officio, Non-Voting)*  
*Chief Executive Officer*  
St. Louis Regional Health Commission