

for diverse, competent, and sustainable Medicaid mental healthcare combinebh.org

December 15, 2021
The Honorable Julie McCluskie,
Chair Joint Budget Committee
200 East 14th Avenue, Third Floor Denver, CO 80203

CC: Elisabeth Arenales, Senior Policy Advisor at Office of Governor Jared Polis Tracy Johnson & Jo Donlin, HCPF Summer Gathercole, BHA JBC members Eric Kurtz, JBC staff

Dear Representative Chairwoman McCluskie,:

COMBINE is a small donor political committee, currently representing over 500 Medicaid mental healthcare providers and clinic directors statewide, organized to support providers contracted by Regional Accountability Entities (RAEs; Anthem, United Healthcare, and Colorado Access) to deliver care. We are solo providers, small clinics, and OBH licensed community mental health clinics, referred to as the IPN, the independent provider network.

In advance of the JBC HCPF hearing on December 16, 2021, we are concerned about a December 15 statement by HCPF Executive Kim Bimistefer regarding provider census and we'd like the committee to know our concern. We have repeatedly expressed concern that the Network Adequacy Reports are inadequate, inaccurate, and late. No legislator should be satisfied with the situation where the simplest statistic, the number of providers, isn't known.

Here's is the statement released by HCPF in "Provider Newsletter":

------Forwarded message -----From: Colorado Department of Health Care Policy & Financing <a href="https://documes.org/">https://documes.org/</a>
Date: Wed, Dec 15, 2021 at 9:35 M Subject: Provider Association Newsletter December 2021
To: <a href="mailto:sandrewroselpc@boulderemotionalwellness.org">sandrewroselpc@boulderemotionalwellness.org</a>



Here's text from the Newsletter:

A Message from the Executive Director Behavioral Health Transformation

...

Recent funding increases were largely used to expand behavioral health care access and reimbursements - both critical to meeting the rising demand for behavioral health services. In fact, the Health First Colorado network of behavioral health providers has grown by 18%, or more than 1,500 providers over the last 18 months. (Thank you, RAEs, for this partnership.)

...

Here is another statement by HCPF, reported<sup>1</sup> on 11/29/21 by Jennifer Brown of the Colorado Sun, from Marc Williams, HCPF department spokesperson.

"While some providers are ending their Medicaid contracts this fall, the number of behavioral health providers who take Medicaid has grown statewide in the last year, Williams said. Practitioners in the network reached 8,371 in June, compared with 6,029 in April 2020, he said."

So what are we to believe? Mr Williams presents us with a 39% increase, from 6,029 to 8,371, not the 18% increase reported by Ms. Bimistefer.

Further, using Ms. Bimistefer's statistics, we have a discrepancy that demands explanation.

Here's the math, please bear with the algebra:

<sup>&</sup>lt;sup>1</sup> Retrieved December 15,2021 from <a href="https://coloradosun.com/2021/11/29/medicaid-mental-health-claims/">https://coloradosun.com/2021/11/29/medicaid-mental-health-claims/</a>



let x = previous size of provider network. HCPF is saying adding 1500 people increased the network 18%. Therefore...

x(1.18) = x+1500 (right? x grew by 18% because 1500 people joined). so... 1.18x - x = 1500 . 18x = 1500

So x = 8,333 Were there 8,333 providers before and now there are 9,833? Contrast these values with what Marc Williams told Jennifer Brown, 6,029 to 8,371. Not 8,333 to 9,833.

So which is it? If HCPF cannot keep track of the most basic network adequacy statistic, how are they keeping track of the numerator and denominator of the Medical Loss Ratio and other important indicators?

We request that the JBC inquire of HCPF how it tracks the number of providers working for Centers and for non-Center situations.

If you require further information or have additional questions, please contact the committee's Advocacy Director, Andrew Rose, at <a href="mailto:andv@combinebh.org">andv@combinebh.org</a> or 303 225 2708 x100.

In regards,

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We provide mental health services for patients, including Medicaid recipients, from South Denver all the way to Brighton

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