

DEPARTMENT OF HEALTH AND HUMAN SERVICES
OFFICE OF DIRECTOR

ACTION REFERRAL

| | |
|------------------------------|-------------------------|
| TO <i>Singleton/Amick</i> | DATE <i>10/31/13</i> |
|------------------------------|-------------------------|

| DIRECTOR'S USE ONLY | ACTION REQUESTED |
|---|---|
| 1. LOG NUMBER <i>000156</i> | <input type="checkbox"/> Prepare reply for the Director's signature DATE DUE _____ |
| 2. DATE SIGNED BY DIRECTOR _____ <i>✓</i> | <input checked="" type="checkbox"/> Prepare reply for appropriate signature DATE DUE <i>11-12-13</i> |
| <i>cleared, 11/14/13, letter attached</i> | <input type="checkbox"/> FOIA DATE DUE _____ |
| | <input type="checkbox"/> Necessary Action |

| APPROVALS (Only when prepared for director's signature) | APPROVE | * DISAPPROVE (Note reason for disapproval and return to preparer.) | COMMENT |
|--|---------|---|---------|
| 1. | | | |
| 2. | | | |
| 3. | | | |
| 4. | | | |

Jan Polatty

From: Lea Kerrison <lea@kerrisonlaw.com>
Sent: Thursday, October 31, 2013 10:44 AM
To: James Bradford
Cc: Anthony Keck; Deirdra Singleton; Jan Polatty
Subject: Formal Decision Requested - 2013 Withhold Measure (TPC)
Attachments: Formal Decision Requested - 2013 Withhold Measure (TPC).PDF

Jim, as stated in my previous email, the second request for formal decision, against using Timeliness of Prenatal Care as a 2013 Withhold measure, is attached. We look forward to the decisions. Thank you, Lea

Lea B. Kerrison, Esq.
Kerrison Law, LLC
Executive Director, Medicaid Health Plans of South Carolina
845 Lowcountry Boulevard, Suite J
Mount Pleasant, South Carolina 29464
Phone: (843) 606-2242
Facsimile (843) 606-2787
Email: lea@kerrisonlaw.com

Ben, pls log to
Deirdra / Amick.

"Approp Sign"



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Email: lea@kerrisonlaw.com

October 31, 2013

Via Email Only

James D. Bradford, MD
SC Department of Health & Human Services
P.O. Box 8206
Columbia, SC 29202-8206

RE: Request for removal of 2013 Withhold Measure: Timeliness of Prenatal Care ("TPC")
Formal Decision Requested

Dear Jim:

On behalf Absolute Total Care, BlueChoice Health Plan Medicaid, Select Health of South Carolina and WellCare, I request the Department to remove Timeliness of Prenatal Care ("TPC") from the 2013 Withhold Measures. Please provide a formal decision, with rationale, respecting this request.

The Plans have identified obstacles related to TPC. TPC assesses the percentage of live birth deliveries receiving a prenatal care visit in the first trimester or within 42 days of plan enrollment. Data collection occurs between November 6, 2012 and November 5, 2013.

The 2013 Withhold Measures were modified to include IPC on a draft dated March 12, 2013, and the 2013 Withhold Measures were not finalized until this month. Exploration of the HEDIS specifications and data collection time periods yields the following obstacles:

- Due to the time-sensitive nature of the data collection period, plans had insufficient time to provide enhanced outreach to mothers who delivered babies between November 6, 2012 and March 11, 2013.
- Based upon a 40 week gestation, members who delivered between March 12, 2013 and September 12, 2013 were already outside of the prenatal timeliness timeframe. Therefore, the plans did not have sufficient time to provide enhanced outreach services to this population.

The plans did not receive adequate time to reallocate resources to enhanced and more aggressive outreach to over 80% of the population identified in the IEDIS denominator. We respectfully request the Department consider the restricted time frame allowed to enhance outreach to expectant mothers. Given the considerable fiscal consequence for not meeting withholds metrics, we recommend absolving the health plans of this requirement in its entirety. Instead, we ask the Department to consider the tremendous success of the Birth Outcomes Initiative as evidence of the health plans' commitment to South Carolina's families.

Please provide a formal decision, with rationale, respecting this request.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Lea B. Kerrison". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Lea B. Kerrison

cc: Anthony E. Keck
Deirdra T. Singleton

LBK

DEPARTMENT OF HEALTH AND HUMAN SERVICES
OFFICE OF DIRECTOR

RECEIVED

NOV 04 2013

Department of Health & Human Services
Office of Health Programs

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|--|---------|---|--|
| 1. <i>[Signature]</i> | | | <i>Response submitted via email letter + approval by Director Singleton.</i> <i>[Signature]</i> |
| 2. | | | |
| 3. | | | |
| 4. | | | |

Via Email Only

Lea B. Kerrison
Medicaid Health Plans of South Carolina
845 Lowcountry Blvd, Suite J
Mount Pleasant, SC 29464

RE: Request for removal of Timeliness of Prenatal Care (TPC) from 2013
Withholds

Mr. Kerrison:

Thank you for your recent letter requesting the removal of the Timeliness of Prenatal Care (TPC) criterion from the 2013 withhold measures. While your letter articulated concerns regarding the timing of the communication of TPC as an official withhold measure, the South Carolina Department of Health and Human Services (SCDHHS) maintains that the importance of timely and adequate prenatal care has been emphasized as a priority for the last several years. This measure has been captured as a required measure on the report card from 2007 and it has been a key component of the Birth Outcomes Initiative (BOI).

Given the emphasis that SCDHHS has placed on healthy births, and prenatal care in particular, we will maintain Timeliness of Prenatal Care as a 2013 withhold measure.

Sincerely,



Bryan Amick
Director, Pharmacy & Quality

