



February 22, 2021

Office for People with Developmental Disabilities
Theodore Kastner, MD, Commissioner of OPWDD
44 Holland Avenue
Albany NY 12208
theodore.a.kastner@opwdd.ny.gov

Dear Commissioner Kastner,

New York's seven Care Coordination Organizations (CCOs) provide comprehensive, individual and family-focused Care Management. Our services touch all parts of a member's life, connecting the most fragile New Yorker's to critical I/DD, medical and behavioral healthcare, transitional Care Management, and access to community and social supports. New York's CCOs are a lifeline for their members, especially for the 75,000 living in the community with families or on their own. The COVID-19 pandemic has proven that to be fact.

OPWDD's proposed budget cut of 23% or \$93 million, which is in addition to the 16.2% and 5% start-up funding cut already taken in July 2020, will disrupt the lives of over 110,000 New Yorkers and their families (along with nearly 4,000 CCO employees and their families). If this cut is approved, the CCOs will immediately be placed into significant unsustainable operating deficits. This is supported by the following:

The CCO statewide average actual cost per member per month for 2020 was \$339 as compared to the full annual projected CCO statewide average revenue per member per month of \$331, which reflects the annualized July 1, 2020 reduction of 21.2% (16.2% + 5%). As you can see, this reduction actually brought the CCOs below their statewide average spending level.

The proposed additional 23% reduction would result in CCO statewide average revenue of \$255 per member per month on a full annual basis or \$84 per member per month below current cost. As a result, we will no longer have the resources to meet the federal and state requirements to be certified as health homes.

Attached are the staffing and operational components that each CCO must have to meet federal and state requirements. Most of this information was previously provided to you in a letter from us dated September 4, 2019 (attached). In that letter, we clearly articulated the significant differences between providing Health Home Care Management and the previous minimal care coordination model called Medicaid Service Coordination.

OPWDD has indicated to the CCOs that it did not intend to eliminate the health home program and does not have a care coordination back-up plan. Yet, as we presented above, that will be the unintended consequence. In addition, there is another potential consequence from this proposal, in that it could jeopardize the State continuing to access billions of



dollars in Federal funds through the 1915 (c) Home and Community Based Services (HCBS) Waiver program. One of the central tenets of the program requires that care coordination be provided for individuals to receive HCBS waiver funded services.

This proposed funding cut is a broken promise to every person and family who relies on the Office for People with Developmental Disabilities. Less than 3 short years ago, OPWDD promised New York's most vulnerable people the new comprehensive Care Management model they deserved and used this new Care Management model as a critical component of the MRT Redesign Plan and the OPWDD Commissioner's Transformation Panel's recommendations. This proposed cut breaks those commitments and directly conflicts with the Governor's stated policy of **Care Management for All**—while placing the entire waiver program at risk for New York State.

Lastly, in our September 4, 2019 letter, we asked you to "continue the partnership and collaboration with OPWDD and ensure that the future reimbursement rates for the Care Management program are adequate for the sustainability of the complex service model of the CCOs." With urgency, we ask for immediate rejection of the proposed cut so that we can work together in partnership and collaboration to contribute solutions to New York's budget crisis. Solutions that acknowledge a responsibility for our state's fiscal health while taking into account our commitments to the people we all support. Your immediate response is requested.

Sincerely,

Lewis Grossman, CEO, Advanced Care Alliance NY
James Moran, CEO, Care Design NY
Nicholas Cappoletti, CEO, LIFEPlan CCO NY
Bridget Bartolone, President & CEO, Person Centered Services
Katie Wagner, Executive Director, Prime Care Coordination
Patricia Kennedy, Board President, Southern Tier Connect
Yoel Bernath, CEO, Tri-County Care

Attachments

Cc: Kerri Neifeld, Office of Governor Andrew M. Cuomo Assistant Secretary for Human Services and Mental Hygiene at NYS Executive Chamber
Peggy O'Shea, Chief Budget Examiner, New York State Division of the Budget
Kevin Valenchis, Deputy Commissioner, Division of Enterprise Solutions, OPWDD