



Submitted electronically to: <https://medicaid.georgia.gov/patientsfirst/patients-first-act-public-comment>

December 3, 2019

Mr. Blake Fulenwider  
Chief Health Policy Officer  
Georgia Department of Health  
2 Peachtree Street, NW.  
Atlanta, GA 30303

*Re: Section 1115 Medicaid Waiver – Georgia Pathways to Coverage*

Dear Mr. Fulenwider:

Kaiser Permanente of Georgia appreciates the opportunity to provide written comment in response to the construction of a Georgia-specific Section 1115 Medicaid waiver.

In Georgia, Kaiser Permanente (KP) is comprised of the largest non-profit health plan (Kaiser Foundation Health Plan of Georgia) and second largest medical group in the state (The Southeast Permanente Medical Group). KP works within Metro Atlanta and Athens to provide quality care to children in Georgia's Medicaid program.

While KP is not currently permitted to be a Care Management Organization (CMO) in Georgia, Medicaid recipients have access to the Southeast Permanente Medical Group pediatricians through our partnerships with each of the existing CMOs. In this model, Medicaid enrollees receive the highest level of coordinated care in preventive and primary care services. A more complete model of KP's integrated care would align with our participation in the State Health Benefit Plan (SHBP), where KP brings care and coverage together through a unified, prepaid delivery model allowing for more cost-efficient health care delivery to the state and our members. While not currently in consideration, KP would like to continue to explore opportunities for KP's integrated model to further benefit the state and Medicaid enrollees in the geographies we serve. We are hopeful that implementation of a waiver will afford KP the opportunity to serve more Georgians in addition to our current Medicaid and SHBP populations.

KP acknowledges and appreciates the opportunity to participate in the *Patients First Act* Stakeholder Advisory Council and looks forward to working closely with Governor Kemp's office and the Department of Community Health on implementation of both waivers. We offer the following comments regarding the Section 1115 Medicaid waiver.



We agree that health care should be affordable and as a health insurer, KP understands the importance of members having accountability in their health care. Accountability can be accomplished in many ways, financial and otherwise. While work requirements encourage accountability, incentives for healthy activities, including well visits and smoking cessation, are also tools to encourage accountability and healthy behaviors which could positively impact eligibility of coverage. Promoting preventative and primary care early and often assists in avoiding more costly interventions when conditions are not treated in a timely manner. Encouraging active engagement in health care will enable healthier, more productive working Georgians.

Kaiser Permanente appreciates the opportunity to comment on this waiver application and we look forward to working with the state during implementation of this program. Please contact Kirk McGhee, [kirkland.a.mcghee@kp.org](mailto:kirkland.a.mcghee@kp.org) or Shea Ross-Smith, [shea.ross@kp.org](mailto:shea.ross@kp.org) with any questions.

Sincerely

A handwritten signature in blue ink, appearing to read "Jim Simpson".

Jim Simpson  
President  
Kaiser Foundation Health Plan  
Georgia Region

RECEIVED  
OFFICE OF THE COMMISSIONER

Dec 25 2019