



August 7, 2012

The Honorable Charles J. Milligan, Jr.  
Deputy Secretary for Health Care Financing  
Maryland Department of Health & Mental Hygiene  
201 West Preston Street, 5<sup>th</sup> Floor  
Baltimore, MD 21201-2301

Re: Behavioral Health Integration

Dear Deputy Secretary Milligan:

I am writing on behalf of Amerigroup Community Care to express our position on the three options presented by you in your letter of August 1, 2012 integration of behavioral health care services in the Medicaid Program. But first, let me express our appreciation to you for your work, as well as, that of your staff and each of the workgroups this summer to develop and explore the options presented to us today. Clearly, this has been a challenging issue for all and the resulting three potential options is reflective of the time and consideration given by many to develop an integrated delivery system for behavioral health care services to enhance the delivery of quality care that Maryland Medicaid recipients so deserve.

Of the three options presented, Amerigroup strongly supports Option 1, the Protected Carve-In of all behavioral health services to the MCOs for enhanced care coordination of substance abuse, mental health and somatic health care services. As a large MCO serving the HealthChoice Program since 1999, we have faced increasing difficulty in serving our members with multiple chronic care conditions and/or co-occurring disorders and the problem will only become worse with the anticipated increase of HealthChoice participants in CY 20104. These members are less likely to seek or maintain care for other illnesses or conditions when the member's mental health care is not coordinated with other health care needs. As a result, this lack of coordination of care results in poor quality and outcomes for the member and at a greater cost to the State. Should this option be chosen, we look forward to working with you through the remainder of Phase 2 and Phase 3 to establish the specifications of the program in a way that supports and sustains the long term partnership Amerigroup has always had with the Department.

The third option presented, which has been referred to as a Specialty Behavioral Health MCO, is unfamiliar in practice to us and will present certain challenges to ensure that members are treated fairly and without discrimination based on diagnosis. If this option were chosen, Amerigroup will work

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diligently with the State and any vendor chosen by the State to assure that this option is implemented and operated effectively. A final point on this option is very important, Amerigroup strongly believes that if the State chooses this option that the 'protected carve out' should be for all Medicaid benefits. In other words, the entire HealthChoice benefit across all levels of care- including mental health, substance abuse, somatic care, and pharmacy should be carved out and managed by the chosen vendor. To do less, will only invite confusion, operational inefficiencies and a continuation of fragmented care.

Finally, Amerigroup strongly opposes Option 2, the Risk-bearing Carve-Out, because it would only serve to exacerbate existing problems in the program today. Under this option, MCOs would only be responsible for somatic care and be further disadvantaged in serving members with substance abuse and/or mental health care needs. If those needs were to go unmet, it would result in a significant negative impact on the MCOs ability to effectively deliver other health care services. Our experience has shown that members who have unmet substance abuse and/or mental health needs are less likely to access treatment for other illnesses and conditions.

It is important to the program and recipients that any option selected is defined in a way that aligns program interests and is implemented in a way that ensures operational effectiveness. Amerigroup is prepared to work with the State as the phases evolve, to include defining the financing model, covered benefits and covered populations.

Sincerely,

A handwritten signature in black ink, appearing to read 'V. Ancona', enclosed within a large, loopy oval scribble.

Vincent M. Ancona  
President and CEO

VMA:pm