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MEDICINE

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Charles J. Milligan, Jr., JD, MPH
Deputy Secretary, Health Care Financing
Maryland Department of Health and Mental Hygiene
201 West Preston Street
Baltimore, MD 21201

Dear Deputy Secretary Milligan:

The Department of Health and Mental Hygiene faces a difficult task in facilitating stakeholder input and analyzing information as part of the behavioral health integration process. You have worked to foster a transparent process, which has generated constructive dialogue about the opportunities and risks associated with integration. We share your commitment to an effective stakeholder process, which is why representatives and providers from Johns Hopkins have attended each of the large and small group meetings to date. We offer the following comments with an eye towards achieving the best outcome for the thousands of Marylanders in need of integrated care.

With the September reporting deadline approaching, we are concerned that the small groups will be limited in their ability to evaluate each model in a manner that ensures adequate stakeholder input. As you are aware, the small groups were instructed to compare their subject areas to 11 criteria, and to compare that information to each model. To date there has not yet been in depth public comparison of the criteria to the models. With the public process more than halfway completed, we are concerned that stakeholders will not have adequate time to review the small groups' finding in order to offer constructive comments to the Department.

The details of the Department's current conceptualization of how each model might operate in Maryland would be helpful to know at this stage in the process. The large group has provided information on models in other states, but it has not discussed how risk parameters and contractual requirements might work in Maryland. Given the significance of these issues in managing mental health benefits, it would strengthen the process if the Department could provide more specificity, so that stakeholders are better positioned to engage in a constructive dialogue about the opportunities and risks associated with each model.

In addition, it is our understanding that after the large group provides its report to the Secretary, the Department will begin drafting a bill to implement the report's recommendations. We appreciate your commitment to soliciting and considering stakeholder perspectives during this process, and we hope that you will work to create a bill drafting process that is equally inclusive of stakeholder input.

We recognize the challenges that the Department faces in managing this stakeholder process, and we truly appreciate your commitment to transparency. That commitment has generated constructive dialogue about the opportunities and risks associated with integration, and we hope that we can be relied on as a partner as you complete this important process.

Sincerely,

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