



October 11, 2021

Ms. Maureen Corcoran  
Director, Ohio Department of Medicaid  
50 West Town Street, 4<sup>th</sup> Floor  
Columbus, OH 43215

RE: Next Generation of Ohio Medicaid Managed Care

Dear Director Corcoran,

On behalf of people with cystic fibrosis (CF) in Ohio, the Cystic Fibrosis Foundation is grateful for the opportunity to comment on the Ohio Department of Medicaid's (ODM) managed care redesign project, and the various initiatives contained within. We urge the state to ensure as few disruptions as possible as the agency transitions to new managed care plans and a single pharmacy benefit manager (SPBM), particularly as it relates to the ability of CF patients to access their care teams and needed therapies.

Cystic fibrosis is a life-threatening genetic disease that affects nearly 1,550 people in Ohio. CF causes the body to produce thick, sticky mucus that clogs the lungs and digestive system, which can lead to life-threatening infections. Cystic fibrosis is both serious and progressive; lung damage caused by infection is irreversible and can have a lasting impact on length and quality of life. As a complex, multi-system condition, CF requires targeted, specialized care and treatments to address its many manifestations. Medicaid is a crucial source of coverage for people with CF, as over half of children and more than a third of adults living with CF in Ohio rely on the program for some or all of their health care coverage.

The CF Foundation offers the following comments on the *Next Generation of Ohio Medicaid Managed Care* initiative. Furthermore, we recognize the significant undertaking this project represents for ODM and are available to help in any way we can.

**Access to CF Foundation-accredited care centers**

The CF Foundation funds and accredits a network of more than 130 care centers located in hospitals across the country, including 13 programs in Ohio. These centers provide multi-disciplinary, patient-centered care in accordance with systematically reviewed, data-driven clinical practice guidelines. Each center employs a team of dedicated health care professionals, including physicians, pulmonologists, respiratory therapists, dietitians, social workers, and mental health coordinators, among others. Together, care teams apply the latest medical evidence and guidelines, resulting in comprehensive, coordinated care.

As ODM enters the implementation phase of the redesign project, and Medicaid managed care beneficiaries transition to the seven next generation plans in July 2022, it is critical that individuals with cystic fibrosis maintain uninterrupted access to their CF care teams. While the institutions that house CF care centers (see *Appendix* for a complete list of CF care centers), many of which are community and

teaching hospitals, may already have existing contracts with the incumbent managed care plans, it is our understanding that the three newly-awarded managed care plans are still in the process of negotiating their contracts and setting their networks. We urge ODM to ensure that all of the new managed care plans develop comprehensive networks that include coverage of accredited CF care centers, so as not to restrict access to certain institutions and providers. We also ask that ODM add pulmonologists to the list of providers included under “*All Other Provider Network Requirements*” contained within Appendix H of the Medicaid Managed Care Provider Agreement.<sup>1</sup>

### **Access to cystic fibrosis medications**

As stated previously, people with cystic fibrosis rely on a variety of targeted, specialized treatments and medications in order to manage the progression of their disease and address its many manifestations. These include modulator therapies that correct the genetic defect of the disease, mucociliary drugs that break up and hydrate mucus in the lungs so that it can be cleared, anti-infectives to treat the bacteria that get trapped and colonize in the airways, and pancreatic enzymes to help with digestion and absorb essential nutrients, among others. Taken together, these critical therapies help people with cystic fibrosis live longer, healthier lives. Due to the progressive nature of the disease, CF patients without consistent access to their medications face increased risk of lung exacerbations, irreversible lung damage, and costly hospitalizations.

We ask that ODM include all FDA-approved cystic fibrosis therapies on the Unified Preferred Drug List (UPDL) per their respective labels and urge the Department to work with the single pharmacy benefit manager to develop clinical and prior authorization policies that are consistent with clinical care guidelines and practices, without placing inappropriate restrictions on access to these drugs. We would be happy to connect ODM with local cystic fibrosis experts in our care center network to further discuss the standard of CF care and importance of access to the aforementioned therapies.

### **Proposed enrollment changes and continuity of care**

It is our understanding that ODM is considering changes to its current Medicaid enrollment process, to be implemented in conjunction with the new managed care plans. Under the newly proposed process, beneficiaries would no longer be automatically re-enrolled in their existing managed care plan; rather, they would have to actively select a managed care plan during open enrollment, or one would be assigned to them. While the CF Foundation recognizes the importance of individuals being more involved in plan selection, we are concerned that this change could pose as an additional administrative barrier to enrollees and potentially lead to disruptions in access to needed care. Should ODM decide to move forward with the proposed changes to enrollment, we encourage you to communicate early and often with enrollees to ensure they understand the forthcoming changes, and allow individuals at least 90 days to choose a different plan than the one selected for them.

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The CF Foundation and our clinician partners at care centers throughout the state stand ready to serve as a resource to the Department as you work to implement these policies and consider additional changes to Medicaid managed care. Thank you for the opportunity to comment on this initiative.

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<sup>1</sup> [https://medicaid.ohio.gov/static/Providers/ProviderTypes/Managed+Care/Provider+Agreements/2021\\_08\\_MMC.pdf](https://medicaid.ohio.gov/static/Providers/ProviderTypes/Managed+Care/Provider+Agreements/2021_08_MMC.pdf)

Sincerely,

**Mary B. Dwight**

Chief Policy & Advocacy Officer  
Senior Vice President, Policy & Advocacy

**Eliot Dasenbrook, MD, MHS**

Co-Director, Adult CF Care Center  
Cleveland Clinic Cystic Fibrosis Program  
Cleveland, OH

**Greg Omlor, MD, FAAP, FAASM**

Director, Pediatric CF Care Center  
Children's Hospital Medical Center of Akron  
Akron, OH

**Karen S. McCoy, MD**

Director, Pediatric CF Care Center  
Nationwide Children's Hospital  
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**Bruce C. Marshall, MD**

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**Erica Roesch, MD**

Director, Pediatric CF Care Center  
Rainbow Babies and Children's Hospital  
Cleveland, OH

**M. Veronica Indihar, MD**

Director, Adult CF Care Center  
University of Cincinnati Medical Center  
Cincinnati, OH

## *Appendix*

### **Ohio Cystic Fibrosis Care Centers**

1. Children's Hospital Medical Center of Akron – Pediatric  
Akron, OH 44308  
Director: Gregory J Omlor, MD
2. Children's Hospital Medical Center of Akron – Adult  
Akron, OH 44308  
Director: Titus Sheers, MD, MBA, FACP
3. Cincinnati Children's Hospital Medical Center – Pediatric  
Cincinnati, OH 45229  
Director: Christopher Michael Siracusa, MD
4. University of Cincinnati Medical Center – Adult  
Cincinnati, OH 45267  
Director: M. Veronica Indihar, MD
5. Cleveland Clinic Cystic Fibrosis Program – Adult  
Cleveland, OH 44195  
Co-Directors: Elliott C Dasenbrook, MD, MHS; Nathan Kraynack, MD
6. Dayton Children's Hospital – Pediatric  
Dayton, OH 45404  
Director: Gary A. Mueller, MD, FCCP
7. Dayton Adult CF Program – Adult  
Dayton, OH 45404  
Co-Directors: Hari M. Polenakovik, MD; Ryan Simon, MD
8. Nationwide Children's Hospital – Pediatric  
Columbus, OH 43205  
Director: Karen S. McCoy, MD
9. Nationwide Children's Hospital – Adult  
Columbus, OH 43205  
Co-Directors: Alpa Patel, MD; John Heintz, MD
10. Rainbow Babies & Children's Hospital / University Hospitals Cleveland Medical Center – Pediatric  
Cleveland, OH 44106  
Director: Erica Ann Roesch, MD
11. Rainbow Babies & Children's Hospital / University Hospitals Cleveland Medical Center – Adult  
Cleveland, OH 44146  
Director: Kimberly C. McBennett, FACP, MD, PhD
12. Toledo Children's Hospital – Pediatric  
Toledo, OH 43606  
Co-Directors: Bruce A Barnett, MD; Jennifer Ruddy, MD
13. Northwest Ohio Cystic Fibrosis Center – Adult  
Toledo, OH 43606  
Co-Directors: Ronald Wainz, MD; Bruce A Barnett, MD