



September 20, 2019

Jami Snyder
Director, Arizona Health Care Cost Containment System
801 E. Jefferson Street
Phoenix, AZ 85034

Dear Ms. Snyder:

CleanSlate Centers is grateful for the opportunity to comment on the proposed merger of Centene Corporation (dba in Arizona as Arizona Complete Health) and WellCare Health Plans (dba in Arizona as Care 1st Health Plan), currently under consideration by AHCCCS.

CleanSlate, founded in 2009, is a nationally recognized outpatient, medical-behavioral integrated addiction medicine practice that utilizes FDA-approved medications for the treatment of opioid and alcohol use disorders, in addition to behavioral health and supportive services that also support treatment of polysubstance use and address the root causes of the patient's addiction. We are actively treating over 16,000 patients each month in 67 centers across the country, including over 600 patients in our four Arizona clinics.

CleanSlate is unsurpassed in our commitment to providing high quality, evidence-based addiction treatment to every patient who walks in our door. In addition to pursuing state-specific licensure, all of our treatment centers will be accredited by the Commission on Accreditation of Rehabilitation Facilities (CARF) by third quarter 2020. Our commitment to quality goes hand in hand with our commitment to access. Many of our patients have been disenfranchised and marginalized as a result of their substance use and behavioral health disorders, making the cost of care a major barrier to treatment and long-term recovery. Cost is not a barrier to CleanSlate's care. Since our inception, CleanSlate has been an insurance-based healthcare provider that contracts with insurance-companies serving individuals covered by Medicaid, Medicare and commercial products.

In Arizona, we have successfully fulfilled our mission by contracting with nearly every Medicaid managed care organization (MCO) in AHCCCS' Central Geographic Service Area (GSA) except Centene and Steward HealthChoice. CleanSlate's contracts with Banner University Family Care (UFC), Magellan Complete Care, Mercy Care Plan, UnitedHealthcare Community and State and Care 1st Health Plan allows us to serve the needs of the Central Geographic Service Area (GSA) and the thousands of Arizonans struggling with SUD. Sadly, despite our repeated and protracted attempts to negotiate contracts like those agreed upon by the other MCOs, Centene and Steward HealthChoice have refused to engage. In fact, they have refused to consider value-based arrangement and numerous other reimbursement options that CleanSlate has suggested. The result was that CleanSlate could not bring our life-saving services to all AHCCCS members in the Central GSA or to any of the AHCCCS members in the Northern or Southern GSA.

When AHCCCS' awarded the Arizona Complete Care (ACC) contracts that transitioned Medicaid members into a "carved in" behavioral health and substance use disorder treatment system it meant that CleanSlate's inability to contract with Centene and Steward HealthChoice was no longer the sole

barrier to bringing our life-saving services to the Medicaid members in the Southern and Northern GSAs. To put it simply, it is our relationship with Care 1st that makes it possible for CleanSlate to bring MAT services to the Northern GSA. Similarly, it is our relationship with Banner UFC and a carved-in BH and SUD system of care that make it possible to bring MAT services in the Southern GSA.

Upon learning about the proposed acquisition of Care 1st, CleanSlate immediately reviewed AHCCCS' requirements for health plan acquisition. Our review of AHCCCS policy uncovered the provision that any health plan intending to merger with or acquire an AHCCCS contracted health plan is required to submit a transition plan to AHCCCS. The transition plan must detail any material change to operations as specified in Section D of the AHCCCS contract, which is defined as a "change in overall business operations (i.e., policy, process, protocol, such as prior authorization or retrospective review) which affects, or can reasonably be foreseen to affect, the Contractor's ability to meet the performance standards as described in the contract. It also includes ***any change that would impact more than 5% of total membership and/or provider network in a specific GSA.***" While CleanSlate cannot assure that our contract with Care 1st impacts more than 5% of the total provider network capacity for office based medication assisted treatment (MAT) in the Central GSA, we know that the entire state of Arizona is experiencing a shortage of office based MAT providers and we know the state is investing significant resources to increase treatment capacity. Given our experience with Centene, it is reasonable to assume that the contract we have negotiated with Care 1st will be terminated after the mandatory transition period ends. This inevitable action will adversely impact our Care 1st patients who today are on the road to recovery. This inevitability combined with our difficulties contracting with Steward HealthChoice will be catastrophic for the Medicaid members in the Northern GSA.

CleanSlate is committed to our patients in Maricopa County, many of whom are insured by Care 1st Health Plan, and we are committed to expanding access to office-based treatment for opioid use disorder to Medicaid members across the state of Arizona. But, without partnership from the only health plan that will serve all AHCCCS' members, we will never be able to help the members in the underserved communities in the Northern GSA and our ability to help members in the Central and Southern GSAs will be greatly diminished. Given Centene's hostility toward CleanSlate, we are concerned that a merger between Centene and WellCare may not only jeopardize Care 1st patients' ability to continue their treatment with us but it will also give Centene the ability to restrict access to care statewide.

If AHCCCS approves Centene's acquisition of Care 1st, CleanSlate respectfully requests that AHCCCS ensures Centene cannot restrict access to care by stipulating the following:

1. Centene honor the terms of all Care 1st contracts for BH and SUD services for the duration of each contract and,
2. Centene automatically approve Members' request for health plan reassignment from any Member engaged in an active treatment plan for behavioral health and/or substance use disorder treatment, if the request is based on the Members' desire to continue treatment with a provider who is not contracted with Centene.



CleanSlate's request stems from our desire to continue serving our patients and the Arizona providers that care for them.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Marotta". The signature is fluid and cursive, written over a white background.

Gregory Marotta

Chief Executive Officer, CleanSlate Centers

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