

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard, Mail Stop: S2-26-12  
Baltimore, Maryland 21244-1850



August 31, 2018

Rebecca Pasternik-Ikard  
Chief Executive Officer  
Oklahoma Health Care Authority  
4345 N. Lincoln Boulevard  
Oklahoma City, OK 73105

Dear Ms. Pasternik-Ikard:

I am pleased to inform you that the Centers for Medicare & Medicaid Services (CMS) has approved your request to extend Oklahoma's Medicaid demonstration, entitled "SoonerCare" (Project Number 11-W-00048/6), under authority of section 1115(a) of the Social Security Act (the Act). The state may deviate from the Medicaid state plan requirements only to the extent those requirements have been waived or specifically listed as not applicable to the expenditure authorities as described in the demonstration. The approval is effective August 31, 2018 through December 31, 2023.

In this extension package, changes were made to the special terms and conditions (STCs), waivers, and expenditure authorities to reflect the state's plans to expand Health Access Networks (HAN) statewide, to incorporate technical corrections which include corrections to numbering and grammatical changes, and to include new temporary expenditure authority in order to test whether the provision of ten months of federal financial participation in payments to certain medical education programs will help ensure the availability of residents participating in these programs to Medicaid patients, thus furthering access to services furnished to Medicaid beneficiaries by these residents. The state has indicated that it can secure funding effective July 1, 2019 for covering costs necessary to keep these programs accredited, and thus in place for purposes of availability of residents to Medicaid beneficiaries. This expenditure authority is designed to test whether the short-term expenditure authority will ensure the continuation of vital health care and provider support programs during the period of its authorization. This expenditure authority will be evaluated to determine whether this demonstration purpose has been met, and the role the funding under this demonstration played in this.

CMS also has modified the state's waiver of retroactive eligibility to remove the authority to waive retroactive eligibility for pregnant women and children under 19. Section 1902(l)(4) of the Act provides that any state providing medical assistance to its residents under a section

1115 demonstration must provide medical assistance to pregnant women (including during the 60-day post-partum period) and children under 19 years of age in the same manner as the state would be required to provide medical assistance under the state plan, which extends to the mandatory provision of retroactive eligibility. The waiver of retroactive eligibility is designed to encourage preventive care and reduce Medicaid costs. If eligible individuals wait until they are sick to enroll in Medicaid, they are less likely to obtain preventive health services during periods when they are not enrolled. By waiving retroactive eligibility for beneficiaries enrolled in SoonerCare (with exceptions for pregnant women and children under 19), the demonstration tests the efficacy of measures designed to encourage eligible individuals to enroll earlier, to maintain health insurance coverage even while healthy, and to obtain preventive health care. Similar waivers for retroactive eligibility have been included in prior demonstration projects.

The state's public comment period began on June 10, 2017, and lasted through September 30, 2017. The state held two public hearings in July and September 2017, including a tribal consultation session, to seek comment on the extension. During this notice period, the state received several comments seeking more information on the programmatic features of the demonstration. The state responded to each commenter with follow-up information.

CMS posted the extension request for public comment at the federal level on Medicaid.gov from January 11, 2018 through February 9, 2018. CMS received one comment on the extension request in support of funding for medical education. CMS also received nine comments in support of the state's January 19, 2018 demonstration amendment proposing funding for the state's request to fund graduate medical education programs between February 2, 2018 and March 4, 2018. Commenters stated strong support for the programs and cited how the clinics that provide graduate medical education serve as important points of access to medical services for SoonerCare beneficiaries.

The extension of the SoonerCare demonstration is likely to promote the objectives of the Medicaid program because the demonstration improves access to high-quality, person-centered services that produce positive health outcomes for individuals and enhances alignment between Medicaid policies and commercial health insurance products to facilitate smoother beneficiary transition.

CMS' approval of this section 1115 demonstration is conditioned upon compliance with the enclosed list of waivers, expenditure authorities and STCs defining the nature, character, and extent of anticipated federal involvement in this project. The award is subject to CMS receiving your written acknowledgement of the award and acceptance of these STCs within 30 days of the date of this letter. A copy of the revised STCs, waivers, and expenditure authorities are enclosed.

Your project officer for this demonstration is Ms. Annie Hollis. She is available to answer any questions concerning your section 1115 demonstration. Ms. Hollis's contact information is:

Centers for Medicare & Medicaid Services  
Center for Medicaid and CHIP Services  
Mail Stop: S2-03-17  
7500 Security Boulevard  
Baltimore, MD 21244-1850  
Telephone: (410) 786-0795  
E-mail: [annie.hollis@cms.hhs.gov](mailto:annie.hollis@cms.hhs.gov)

Official communications regarding this demonstration should be sent simultaneously to Mr. Bill Brooks, Associate Regional Administrator for the Division of Medicaid and Children's Health in our Dallas Regional Office. Mr. Brooks' contact information is as follows:

Centers for Medicare & Medicaid Services  
1301 Young Street, Room 714  
Dallas, Texas 75202  
Telephone: (214) 767-4461  
E-mail: [Bill.Brooks@cms.hhs.gov](mailto:Bill.Brooks@cms.hhs.gov)

If you have any questions regarding this approval, please contact Ms. Judith Cash, Director, State Demonstrations Group, Center for Medicaid and CHIP Services at (410) 786-9686. We look forward to continuing to work with you and your staff on the operation of this demonstration.

Sincerely,

/s/

Timothy B. Hill  
Acting Director

Enclosures

cc: Bill Brooks, Associate Regional Administrator, CMS Dallas Regional Office