



July 8, 2019

Christy Blakely
Medical Services Board President
Department of Health Care Policy and Financing
303 E. 17th Street
Denver, CO 80203

RE: MSB 19-06-06-A Revision to the Medical Assistance Rule Concerning the FQHC Rule, Section 8.700

Dear Ms. Blakely and Medical Service Board Members:

On behalf of the Colorado Community Health Network (CCHN), I am writing to express support for the proposed revision to the Federally Qualified Health Center (FQHC) rule through MSB 19-06-06-A.

CCHN is the membership association for Colorado's 21 FQHCs, which operate more than 200 clinic sites in 42 counties and care for Coloradans from 61 of the 64 counties in the state. FQHCs are the health care home for more than 790,000 people, including 35% of Medicaid enrollees, 22% of CHP+ enrollees, and 37% of Colorado's uninsured. Over 93% of patients at Colorado FQHCs have family incomes below 200% of the Federal Poverty Level. CCHN's mission is to support FQHCs to increase access to high quality health care for people in need in Colorado.

This rule revision will implement a second Alternative Payment Methodology (APM 2) for FQHCs in Colorado as allowed under Section 1902(bb)(6) of the Social Security Act. This APM 2 will allow some FQHCs to transition from encounter-based payment to a population-based payment. This new model will allow participating FQHCs to better utilize their care teams and engage patients in ways that align with both patient needs and data-driven best practices.

The proposed rule change is the result of multiple years of collaborative work between Colorado FQHCs, CCHN, and the Department and will ultimately allow Colorado's FQHCs to further transform their model of care and advance the quadruple aim: improve patient experience, improve health of the populations served, reduce per capita cost of health care, and improve staff satisfaction.

CCHN is grateful for the Department's collaborative efforts to promote the innovation of FQHCs payment models. We look forward to continuing to collaborate to improve health care outcomes and access for Coloradans across the state.

Sincerely,
Polly Anderson

A handwritten signature in black ink, appearing to read "Polly Anderson", with a long, sweeping underline.

Vice President of Strategy and Financing