



December 4, 2018

Members of the Wisconsin Legislature  
 Wisconsin State Capitol  
 2 East Main Street  
 Madison, WI 53702

Dear Legislators:

As organizations dedicated to high quality, affordable health care across the State of Wisconsin, we have significant concerns with AB 1072 as currently written, as well as the identical provisions included in AB 1073.

Together, these bills number nearly two hundred pages and make numerous changes to an already complex \$9 billion Medicaid program. We have not been included in the process of developing this legislation up to this point, and with the accelerated schedule for JFC review and full floor consideration in just two days, there is simply too much in these bills to be able to accurately understand how the many different provisions will impact the State of Wisconsin and the communities we serve.

While we understand the Legislature’s interest in securing the implementation of a Section 1115 Medicaid waiver, we are concerned this legislation goes much further and could have unintended consequences that will impact health care delivery in Wisconsin. Rather than simply codifying the 1115 waiver as agreed to by CMS and the Walker administration, the legislation appears to be more restrictive than the waiver itself, which could create unforeseen implementation challenges that negatively impact the Medicaid program and its members.

Furthermore, the legislation includes a number of changes to the administration of the Medicaid program that go well beyond what is in the 1115 waiver. Some of the included provisions related to JFC and/or legislative approval for rate changes or potentially state plan amendments could have significant implications that require more input from stakeholders in order to fully understand their impacts.

If the Legislature is focused on protecting the current waiver, it should do so more narrowly, while including valuable stakeholder feedback that has so far been missing from the process. Again, we appreciate and respect the important role the Legislature plays in ensuring access to quality, affordable health care in Wisconsin. However, the depth and breadth of the provisions in AB 1072 and AB 1073 related to the Department of Health Service's administration of the Medicaid program is far too complex for the expedited timetable the bills are on. We respectfully ask that those provisions be removed from the bills.

Sincerely,

Alliance of Health Insurers  
America's Health Insurance Plans  
Anthem  
Ascension  
Aspirus  
Association of Wisconsin Surgery Centers  
Aurora Health Care  
Children's Hospital of Wisconsin  
Froedtert  
Gundersen Health System  
Hospital Sisters Health System  
Inclusa  
Leading Age Wisconsin  
Magellan Healthcare  
Marshfield Clinic Health System  
Mayo Clinic Health System  
Medical College of Wisconsin  
Molina Healthcare  
Oneida Nation  
Pharmacy Society of Wisconsin  
Rural Wisconsin Health Cooperative  
SSM Health  
United Healthcare  
UW Health  
Wisconsin Academy of Family Physicians  
Wisconsin Academy of Physician Assistants  
Wisconsin Dental Association  
Wisconsin Health Care Association/Wisconsin Center for Assisted Living  
Wisconsin Hospital Association  
Wisconsin Medical Society  
Wisconsin Nurses Association  
Wisconsin Primary Health Care Association  
WPS Health Insurance