

April 20, 2018

Mr. Erik Lujan
Chairman, APCG Health Committee
All Pueblo Council of Governors
2401 12th St. NW Suite 2145
Albuquerque, NM 87104
elujan78@gmail.com

Dear Mr. Lujan,

The New Mexico Human Services Department (HSD) appreciates the All Pueblo Council of Governors' (APCG) response to the Request for Information (RFI) to establish an Indian Managed Care Entity (IMCE) in accordance with federal provisions. HSD released the RFI in January 2018 to gauge interest of New Mexico Tribal organizations and inform policy considerations regarding the establishment of an IMCE in New Mexico. We received three responses to the RFI and have thoroughly reviewed all responses.

A committee comprised of HSD staff from the Office of the Secretary and the Medical Assistance Division thoroughly reviewed APCG's response and determined that it is not able to proceed with next steps because APCG has not yet formed the IMCE and its response did not contain sufficient information about the relationship between APCG and the national Medicaid managed care organization referred to throughout the response. There was also no indication in the response that a formal agreement, or intent to enter into an agreement, had been established between the two entities. Without such critical information about foundational requirements and organizational structure, HSD is unable to assess capacity and readiness to establish an IMCE and enter into the Centennial Care managed care agreement that requires assuming full financial risk, providing all of the required administrative functions, delivering all of the covered benefits and services to members and complying with all applicable federal and state law.

Although unable to proceed with next steps to establish Native American Managed Care Organization, as an IMCE, APCG has opportunities to work with the Centennial Care 2.0 managed care organizations to gain experience in assuming some level of risk for managing a subset of members through a value-based purchasing agreement, including arrangements that could qualify under the federal IMCE requirements. The Centennial Care 2.0 MCO contracts allow for delegation of care coordination in two different models—a full delegation model and a shared functions model. HSD would welcome further discussions with APCG in its pursuit of opportunities to partner with the MCOs to advance the goals and initiatives of tribal communities and the State.

HSD appreciates the effort that APCG extended in its response to the RFI. We look forward to continuing to make progress on the initiative to establish a Native American MCO, as an IMCE, in New Mexico and will share relevant information about this effort with stakeholders as it becomes available.

Sincerely,



Brent Earnest
Secretary

Cc: Mike Nelson, Deputy Secretary, HSD
Chris Collins, Deputy Secretary, HSD
Amber Carrillo, Native American Liaison, HSD
Nancy Smith-Leslie, Director, Medical Assistance Division, HSD
Dan Clavio, Medical Assistance Division, HSD