



November 2, 2021

Texas Health and Human Services Commission
Via Email: OPP_SMMCAC@hhsc.state.tx.us

Re: Comments on Stakeholder Input Regarding Healthy Texas Women's Transition into Managed Care

The Texas Women's Healthcare Coalition (TWHC) and its 87 healthcare, faith, and community based member organizations are dedicated to improving the health and well-being of Texas women, babies, and families by ensuring access to preventive healthcare for all Texas women. Access to preventive and preconception care – including health screenings and contraception – means healthy, planned pregnancies and early detection of cancers and other treatable conditions.

On behalf of the Texas Women's Healthcare Coalition, thank you for this opportunity to provide public comment to the State Medicaid Managed Care Advisory Committee on the transition of Healthy Texas Women (HTW) into Medicaid Managed Care, as directed by House Bill 133, 87th Legislative Session.

As part of the implementation, the Texas Health and Human Services Commission (HHSC) shall identify barriers that prevent women from obtaining HTW services and seek opportunities to mitigate those barriers. The TWHC believes that client access can be influenced by providers' ability to understand and execute program expectations. To support the provider network, TWHC recommends establishing a process to solicit stakeholder review and comment related to changes to the Uniform Managed Care Manual and any other documents establishing policy and program administration guidelines impacting HTW.

In October 2021, HHSC called for providers in the Family Planning Program (FPP) to submit a signed affirmation regarding emergency contraception. Historically, emergency contraception has not been a covered service through FPP or HTW, but providers who receive other funding from programs that do allow emergency contraception are able to submit claims to those other funding streams. Though this affirmation does not describe any change of FPP policy, it did introduce questions related to program administration, and caused confusion on what procedure codes providers could submit, while maintaining adherence to program expectations.

While this example is in a program outside the committee's purview, it does highlight an opportunity to proactively institute stakeholder review and comment for managed care programs to avoid disruptions to provider networks and clients' access to care. When changes are made, especially those that impact program administration, providers should be made aware and given the opportunity to share their experience and expertise in delivering services.



A stakeholder review and comment process would allow for greater provider engagement, clearer communication, and could foster improved confidence in the transition process into Managed Care. The preventive services provided through HTW are essential to the health and well-being of all Texans, and understanding what providers need to render those services is paramount to the program's success.

Thank you for your consideration. If you have any questions or if we can provide further information, please contact me at (210) 223-4589 or EDelgado@TexasWHC.org.

Respectfully submitted,

A handwritten signature in black ink that reads "Evelyn Delgado". The signature is written in a cursive style with a large, looped "E" and "D".

Evelyn Delgado
Chair, Texas Women's Healthcare Coalition