



From: Mary Bethel, Chair of the NC COA Board of Directors and
Sandra Phelps, Executive Director

Re: NC COA's Comments on NC DHHS's Approach to Standard Plan Re-Procurement

Date: May 6, 2025

The [North Carolina Coalition on Aging \(NC COA\)](https://www.ncccoalitiononaging.org) is a 501(c)(3) organization that works to improve the quality of life for older adults in North Carolina through collective advocacy, education, and public policy work. We have a broad-based membership of advocacy organizations, service providers, trade associations, health plans, people who rely on services and family caregivers.

Thank you for inviting comment on the Department's preliminary direction outlined in *Improving Member Health Through Managed Care Program Enhancements: North Carolina's Approach to Standard Plan ReProcurement*. NC COA's high-level comments are outlined below.

- We appreciate the Department's commitment to coordination of care and to more comprehensively supporting dually eligible beneficiaries.
- We support the Department's proposed transition to three, statewide health plans, potentially including provider-led entity models. Appreciating the impact procurement-related transitions have on beneficiaries, we look forward to the Department communicating its approach for ensuring continuity of care during the transition between contracted health plans.
- We support continued efforts to simplify processes and requirements as outlined in the "Improved Standard Plan Accountability" section of the paper.
- The Department should ensure Standard Plans have fully matured and can consistently meet quality, reimbursement and contracting requirements before integrating additional, highly vulnerable populations.
- We do not offer an opinion on how the Department should integrate dually eligible beneficiaries into the Standard Plan option. Given the significance of this proposed scope expansion and its impact on beneficiaries, their families and their service providers, NC COA urges the

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Department to more fully articulate its anticipated design for integrating dually eligible beneficiaries. This description should be informed by the collective experience of beneficiaries currently receiving LTSS services under the Standard Plan option and of dually eligible beneficiaries currently receiving services under Medicaid Direct. We encourage the Department to communicate additional information including:

- A comprehensive, data informed assessment of how the Standard Plan model will improve the dually eligible beneficiaries' (and as applicable, their caregivers) care experience and health outcomes.
- A comprehensive description of the Department's projected LTSS program design and how dually eligible beneficiaries will navigate an integrated care delivery model.
- How the current Standard Plan care management design will be revised to support dually eligible beneficiaries, including how NC's current AMH-Tier 3 design would be adjusted to most appropriately meet the needs of these beneficiaries.
- How the Department's quality strategy, contractual performance metrics and staffing structure will be revised to reflect the needs and healthcare context of dually eligible beneficiaries.
- How Standard Plans will ensure their provider network capacity is sufficient to support the exponential growth of NC's older adult population.
- How capitation rate models will adequately reflect the increased acuity of dually eligible beneficiaries and assist in stabilizing NC's direct care workforce crisis.
- How Standard Plan contracts will be leveraged to support and strengthen the LTSS direct care workforce.

As a long-time, trusted collaborator, NC Coalition on Aging invites continued dialogue between the Department and Coalition members on these critical policy decisions. Thank you for your continued commitment to the wellbeing of Medicaid beneficiaries and older adults in North Carolina.