## November 10, 2011

Dr. David Palmer Chief Actuary Health and Human Services Commission 1100 W. 49th Street Austin, Texas 78756

# Re: STAR+PLUS Dallas, Tarrant and Jefferson Rate Amendment

# Dear Dr. Palmer:

The Health and Human Services Commission (HHSC) has made further revisions to the Medicaid fee schedules used to reimburse durable medical equipment providers, physical/occupational/speech therapists (PT/OT/ST), Personal Assistance Services (PAS) for CBA clients and the Diagnosis-related Group (DRG) system used to reimburse many of the state's inpatient facilities. These changes went into effect September 1, 2011. The current FY2012 STAR+PLUS capitation rates were developed using previous versions of the reimbursement schedules for these providers which were assumed to be effective September 1, 2011. After a comparison of the old and new reimbursement factors it was determined that the new factors would materially impact the capitation rates. As a result, we have re-determined the FY2012 capitation rates based on these new factors. In addition, HHSC has made the determination to remove the network access assurance fee (NAF) from the Dallas and Tarrant capitation rates.

This letter amends the report titled State of Texas Medicaid Managed Care Expansion STAR+PLUS Program Rate Setting State Fiscal Year 2012 Dallas, Tarrant and Jefferson Service Areas and dated July 1, 2011. The amended FY2012 capitation rates were developed using identical methods and assumptions as the rates described in that report (current rates), except for the revised DME, PT/OT/ST, PAS and DRG rebasing factors and the removal of the NAF from the Dallas and Tarrant capitation rates. The capitation rates payable for the two-month period January 1, 2012 through February 29, 2012 have been adjusted to recognize that the current capitation rates will be payable for the period September 1, 2011 through December 31, 2011, i.e., the rates have been adjusted in order to produce the amended capitation amounts for the September 1, 2011 through February 29, 2012 period. Effective March 1, 2012, the capitation rates will be set at the FY2012 amended rates.

The attached Exhibit A presents both (i) the FY2012 capitation rates to be payable for the twomonth period January 1, 2012 through February 29, 2012 and (ii) the amended FY2012 STAR+PLUS capitation rates to be payable for the period March 1, 2012 through August 31, 2012. Attachment 5 (revised) presents the revised DME and PT/OT/ST, PAS and DRG rebasing adjustment factors used in developing the amended capitation rates.

Evan Dial

Evan Dial

Actuarial Certification of Amended FY2012 STAR+PLUS Dallas, Tarrant And Jefferson HMO Capitation Rates

I, Evan L Dial, am a principal with the firm of Rudd and Wisdom, Inc., Consulting Actuaries (Rudd and Wisdom). I am a Fellow of the Society of Actuaries and a member of the American Academy of Actuaries. I meet the Academy's qualification standards for rendering this opinion.

Rudd and Wisdom has been retained by the Texas Health and Human Services Commission (HHSC) to assist in the development of their state fiscal year 2012 (FY2012) managed care ratesetting methodology, assumptions and resulting capitation rates and to provide the actuarial certification required under Centers for Medicare and Medicaid Services (CMS) requirements 42 CFR 438.6(c).

I certify that the amended FY2012 HMO capitation rates developed by HHSC and Rudd and Wisdom satisfy the following:

(a) The capitation rates have been developed in accordance with generally accepted actuarial principals and practices;

(b) The capitation rates are appropriate for the populations and services covered under the managed care contract; and

(c) The capitation rates are actuarially sound as defined in the regulations.

We have relied on historical experience data and program information provided to us by HHSC. We have reviewed the data for reasonableness but have not audited the data.

Please note that actual health plan contractor experience will differ from these projections. Rudd and Wisdom has developed these rates on behalf of the State to demonstrate compliance with the CMS requirements under 42 CFR 438.6(c). Any health plan contracting with the State should analyze its own projected premium needs before deciding whether to contract with the State.

Evan Dial

Evan L. Dial, F.S.A., M.A.A.A.

#### FY2012 STAR+PLUS Expansion Capitation Rates - Amended Per Member Per Month Rates

	Medicaid Only		Dual Eligible	
Health Plan	OCC	CBA	OCC	CBA
Effective January 1, 2012				
Dallas	\$ 459.34	\$ 2,356.40	\$ 178.26	\$ 1,178.31
Tarrant	484.48	2,485.35	138.42	914.96
Jefferson	408.44	2,095.29	189.77	1,254.36
Effective March 1, 2012				
Dallas	\$ 455.52	\$ 2,336.78	\$ 177.90	\$ 1,175.94
Tarrant	480.24	2,463.58	138.15	913.15
Jefferson	405.08	2,078.04	189.38	1,251.82

### FY2012 Dallas, Tarrant and Jefferson Area STAR+PLUS Rating Provider Reimbursement Adjustments

	Adjustment Factor (1)		
	Medicaid Only	Dual Eligible	
Fee Schedule Adjustment	0.9968	1.0000	
Substance Abuse Adjustment	1.0031	1.0000	
1% Provider Rate Reductions	0.9810	1.0000	
Outpatient Imaging Fee Schedule	0.9793	1.0000	
Legislative Reduction	0.9588	1.0000	
Provider Adjustment Factor	0.9210	1.0000	
PAS Reduction	0.9863	0.9863	
DRG Rebasing	1.0000	1.0000	

Footnotes:

(1) Average adjustment factors developed for FY2012 STAR+PLUS rating for current STAR+PLUS service areas. Calculations by area detailed in report titled State of Texas Medicaid Managed Care STAR+PLUS Program Rate Setting State Fiscal Year 2012 and ammended in the letter titled STAR+PLUS Rate Amendment and dated November 10, 2011