

Idaho Immunization Assessment Board
Board Meeting Minutes
Monday, August 6, 2012 – Revised/Approved October 29, 2012
Department of Insurance

Board Members Present:

- Jack Myers – Blue Cross of Idaho –Chair
- Richard Rainey, M.D. – Regence BlueShield of Idaho
- Tim Callender – AmeriBen/IEC Group
- Bill Deal, Director DOI
- Christine Hahn , M.D. – Department of Health & Welfare
- Sen. Melinda Smyser – Idaho Senate
- Chris Pickford – Boise School District
- Susan Rhoades – Jackson Food Stores

Board Members Absent:

- Ted Epperly, M.D. – Family Practice Residency – Vice Chair
- Rep. Jeff Thompson

Others Present:

- Sandy Metro – DOI
- Mitch Scoggins - Immunization Program Manager (H&W)
- Tamarie Olson-H & W
- Gina McBride, Consumer Services Bureau Chief, DOI

Call to Order: Chairman Myers called the meeting to order at 1:35 p.m.

Approval of Minutes from 5/24/12 meeting

MOTION: Chair Myers asked for a motion to approve minutes as written. Mr. Tim Callender moved the motion. Dr. Rich Rainey seconded the motion. Motion was passed on a voice vote.

Reports – Update of Survey & Billings

Ms. Sandy Metro opened with a review of the survey and billing status using the Department of Insurance’s new Smart Board. The Board was advised of a Regence TPA that missed their reporting obligations for the past 3 years as the TPA was not listed on the DOI contact list.

Dr. Rich Rainey supplied background information on the Regence Blue Cross-Blue Shield of Oregon group; explaining that the group was not in the data warehouse. After an extensive search, no other group was found that demonstrated this peculiarity and was deemed an isolated incident.

Financial Update from H & W

Tamarie Olson reported on the Dedicated Immunization Vaccine Fund for SFY2012 & SFY2013. Highlights were deposits, the carry forward amount of \$587,510 to SFY2013, and the quarterly expenses in the prior year that were affected by back-to-school immunizations, delays or shortages.

Mr. Tim Callender presented a scenario in which a large dollar carry over is determined to exist, the Immunization program is to sunset in a given year and how the Board would determine redistribution of funds to participating carriers. Ms. Gina McBride explained that any carry over amount would be paid back to the carriers Pro Rata based on how much each paid into the fund.

Chairman Jack Myers suggested a follow-up for a future board meeting to consider whether if the Plan of Operations should specifically state how funds are re-distributed or can this issue simply be decided by the Board at the time the issue arises.

Tricare Update

Sen. Melinda Smyser provided an update on the Tricare issue. No movement as of yet but this issue is classified as a “red flag” and keeps it in the forefront which is Sen. Smyser’s intent.

Mr. Mitch Scoggins clarified that the Wing Commander at Mountain Home Air Force Base was contacted in order to collect data on how many children are provided vaccination services and are also trying to collect data from the Tricare organization.

Director Deal expressed the collective appreciation for the service Sen. Smyser has provided the Board and wished her luck in her new role with Sen. Riche. Sen. Smyser commented that contact will be maintained with Mr. Mitch Scoggins to provide continued follow-up with regards to the Tricare issue.

BC/BS Montana

Chairman Jack Myers apprised the Board on the conversations with BC/BS of Montana’s senior leadership and noted that there is no better guidance at this point but to create a follow up process by sending out a Letter of Demand.

Ms. Sandy Metro commented that the DOI has a standard letter that was used for last year’s demand and that the DOI’s legal counselor, Dep. Attorney Gen. Rich Burleigh, can draw this up for distribution for the violation of the 247 code.

Ms. Gina McBride stated that District Court would be the next step in the process if we do not receive the required survey and subsequent assessed fund amount. The Letter of Demand has a 30 day notice. If BC/BS of Montana is still in a non-compliant status, then District Court is the next step in the process.

Dr. Rich Rainey indicated that enough efforts have been made in a polite manner for compliance and it is reasonable for the Board to suggest to the DOI to become more aggressive in pursuing this matter.

Ms. Sandy Metro reiterated that the Letter of Demand would normally be sent to the BC of Montana attorney who sent the refusal to comply letter. Chairman Myers suggested that a copy of the Letter of Demand be sent to the CEO as well.

New Business - Board Decisions via e-mail

Ms. Sandy Metro stated that in the previous board meeting held on May 24, 2012, the decision was made to alert the Board of any small changes or reductions to assessment amounts via e-mail. The DOI legal counsel informed Ms. Metro that this procedure must not take place in the future due to the Open Meeting Law.

Dr. Rainey commented that the Deputy Attorney Generals have reviewed the wording changes to the Plan of Operations and need to come up with wording suggestions to clarify this issue.

Chairman Myers suggested a process be put in place whereby at the next board meeting, Ms. Metro would supply a list summarizing all of the accounts that have changes to them and indicating that Board members have all responded to the e-mail. The minutes would then reflect that the following changes had occurred and were authorized or approved.

Loss of Flexibility

Dr. Christine Hahn supplied the Board with a background of the Federal 317 vaccine dollars that are received to buy vaccines and used for gap situations. As of October 1st, in all states, Federal 317 vaccine dollars must be used for a very specific group and can no longer be used to cover insured children, such as Tricare children. The IDHW requested a delay in implementation which was denied. An independent request for the number of Idaho children in the Tricare program was also sent to the Department of Defense. No response has been received. IRIS data was presented to show how many insured out-of-state kids were being vaccinated in Idaho. The Dept. of H & W would need to write to the providers and explain that as of October 1st, they can no longer use State supplied vaccines for out-of-state insured children and the same stipulation could be applied to Tricare children as well.

Mr. Mitch Scoggins provided additional clarification on in-state and out-of-state insured children with respect to State and private supplies of vaccines, the scope of the Immunization Survey’s assessment, and the lack of Federal 317 funds after the October 1st deadline. Dr. Rainey added that some boarder providers are ordering private supplies of vaccines.

Dr. Hahn commented that a letter will be drafted and sent out to the providers to alert them of the secession of the 317 funds. No Immunization Board action is required at this time and a copy of the letter will be provided.

IIP Monitoring Vaccine Loss/Wastage

Ms. Tamarie Olson presented a very detailed report on the H & W's procedures for monitoring vaccine loss and wastage, tracking, expiration date alerts and inventory controls to the Board as requested by Chairman Myers. All vaccine inventories are now handled through IRIS (Idaho's Immunization Reminder Information System) which is mandatory for providers. The system is a data base whereby the providers order all vaccines, account for dosage used, and provide a physical vaccine count before any additional vaccine is issued to the provider. Vaccine inventory levels are closely monitored and managed on a lot by lot basis.

Dr. Rainey (?) suggested that a report based on IRIS data be prepared to illustrate utilization and wastage. Ms. Olson also commented that data can be extrapolated from the system at any time; however, since it is a relatively new system, it could take up to 6 months to retrieve reliable data after all provider entry issues are resolved. Mr. Scoggins added that it may take a little while longer than 6 months due to the 45 day provider reporting period after a vaccine is administered and the ordering cycles that are in place. Data from the previous 90 day period is probably the most reliable; therefore, 6 months' worth of reliable data would be available towards the end of the first quarter of the next calendar year.

Sunset Clause

Director Bill Deal reiterated the time frame for the legislature session is to begin in January and further commented that if the Board decides not to reinstate or discontinues the Immunization program then discussions need to begin with the Department of Health and Welfare to get some feedback as to their department's considerations. Director Deal added that if there is no issue then a very minimal change to legislation would take place.

Chairman Myers stated that some analysis has been done at Blue Cross of Idaho, Regence, and AmeriBen (ongoing) with an emphasis on pricing and savings discount comparisons. The Blue Cross of Idaho analysis indicates lower savings than anticipated and savings is declining in each of the three years. Mr. Myers recommends that the program not be sunset as called for by the legislation. However, he recommended that a decision to retain or sunset the program be deferred by two years so that further analysis of stable data may be conducted.

Dr. Rainey commented on the difficulty of analyzing due to the zero billing on the providers side, other moving variables such as the first year's substantial private stock that was purchased which had a significant negative impact on the cost savings percentage, and also the carry over amounts from one year to the next. Regence Actuaries consider the program a small to medium loss at this time; however, this should be considered a preliminary result because of the difficulty in analyzing the data.

Director Deal indicated that the idea of extending the Sunset Clause where everyone feels comfortable is the prudent thing to do at this time and if this is an agreeable issue just to extend it to two years then it should be extended as such. Chairman Myers reiterated that two years would be needed to have enough information from a complete-1 year run-out of data. Director Deal went on to say that if an extension of the Sunset Clause was agreed upon, it would go out to year 2015 and could make it on the legislation.

MOTION: Dr. Rainey moved that the Board accord an extension of the Sunset Clause from the current year 2013 to July 1st 2015. Mr. Tim Callender seconded. Dr. Hahn requested clarification on which entity would bring this forward: the DOI or the Immunization Board. Director Deal suggested that the DOI would draft the legislation and the Immunization Assessment Board would be the entity that brings it forward. It would be a legislative Bill, not a departmental Bill. All present were in favor, none opposed.

TPA Administrator for Immunization Board

Director Deal provided the Board with a background of the duties performed by DOI personnel and stated that due primarily to the Affordable Care Act, DOI assignments have substantially increased and suggested the duties performed for the Immunization Board are transferred to a Third Party Administrator.

Ms. Metro commented that the monies collected would still come to the DOI. Director Deal confirmed that this function would still take place internally and all monies collected are deposited directly into the State Treasury by our fiscal department within 24 hours of receipt.

Mr. Tim Callender made the Board aware of a potential conflict of interest as AmeriBen is also a TPA and that he would have to abstain from any discussion regarding the RFP process. Mr. Callender later commented as clarification to the selection process or duties performed becomes more apparent, he may be able to participate.

Director Deal stated that the job duties are now well defined and a good description could be written up quite easily so the is no question as to what is expected for any TPA applying for these duties. Director Deal also commented that this position is most likely a part-time function and the time would probably amount to an average of 20 hour per month.

Chair Myers commented that administrative duties would be retained by the DOI such as the communication with health plans. The primary duties would be tracking the assessments and the DOI would provide the new administrator with a list of all carrier information. Communication and correspondence would be the critical component.

Dr. Rainey voiced a concern about the new administrator/contractor sending e-mails to the carriers from alternate e-mail accounts and added the Board should build into the RFP that the TPA or Administrator is a contractor of the State and the correspondence is on a State letterhead and that they use a State e-mail address.

Director Deal suggested that the administrative duties be handled just like the High Risk Insurance Pool Board where the minutes are taken by the Administrator, the TPA would be present at the board meetings, and prepare the agenda, Etc. Director Deal also suggested that the DOI attorneys be involved to see what, if any connection the DOI has with the enforcement aspect of the Administrator. Ms. Metro will complete a job description of the administrative duties and bring to the next board meeting for discussion on the scope of service.

Next meeting

Monday, October 29th @2:00pm MDT

Adjournment

The meeting adjourned at 3:25p.m. MDT

Minutes by Scott Frost, Idaho Department of Insurance