



April 15, 2015

Honorable John McCain, Chairman
Senate Armed Services Committee

Honorable Mac Thornberry, Chairman
House Armed Services Committee

Honorable Lindsey Graham, Chairman
Senate Armed Services Personnel
Subcommittee

Honorable Joseph J. Heck, Chairman
House Armed Services Military Personnel
Subcommittee

Dear Chairmen McCain, Graham, Thornberry, and Heck:

The TRICARE for Kids (TFK) Coalition is a stakeholder group of children’s healthcare advocacy and professional organizations, disability advocacy groups, military and veterans’ service organizations, and military families committed to ensuring that TRICARE meets the unique health needs of the more than two million children of military families covered by TRICARE. While all children have unique needs as compared to adults, children in military families face distinct experiences due to the very nature of their parents’ service to our nation. The practical difficulties that accompany deployments and frequent relocations must be taken into consideration when fashioning the health, medical and social support systems necessary to serve these families.

The TFK Coalition appreciates the leadership of Senate and House Armed Services Committees as you analyze and respond to the findings and proposals of the Military Compensation Retirement and Modernization Commission (MCRMC). While each member of the TFK Coalition maintains its own perspective and position regarding the MCRMC proposals, we all agree that the military healthcare system must take into account and be

appropriately responsive to the unique health needs of children in military families. Many of the MCRMC's findings are on point with concerns we have previously raised ([TFK Coordinated Response](#)). It is gratifying but sobering to see the objective analysis point out many of the same systemic barriers and challenges to meeting the unique needs of military children.

Your Committees recognize the importance of protecting the health needs of military children as demonstrated in the passage of the "TRICARE for Kids" legislation in Section 735 of the 2013 National Defense Authorization Act. This section directed the Secretary of Defense to perform a comprehensive review of the military health system as it relates to children and to report to the SASC and HASC its findings and plan of action for ensuring children's needs are met. As you know, the Section 735 TRICARE for Kids Report was released in July 2014, which identified gaps and potential problem areas aligned with concerns raised by the TFK Coalition, and cited by the MCRMC. The Department's TRICARE for Kids Report did not include, however, the requested plan of action for addressing gaps and improving children's care.

The Coalition urges Congress to both strengthen the current TRICARE system by addressing already-identified gaps and issues of concern pursuant to TRICARE for Kids, and to ensure that children's unique health needs are addressed in any proposed changes to the TRICARE framework, such as those contemplated by the MCRMC or any variations that may be considered by the Armed Services Committees.

The TFK Coalition has identified overarching issues and concerns that must be addressed in the current system and when contemplating any changes:

- Align benefits with the American Academy of Pediatrics (AAP) Bright Futures guidelines, which is required by non-grandfathered insurance plans through the Affordable Care Act, as well as Medicaid's Early and Periodic Screening, Diagnostic, and Treatment (EPSDT) standard;
- Define medical necessity specific to pediatrics (AAP definition, July 29, 2013);
- Ensure pediatric network adequacy, including access to pediatric specialists;
- Facilitate patient (child and family) centered care and medical home models tailored to the child's health needs, including children with special and complex medical conditions;
- Include a defined child- and youth-specific behavioral and mental health benefit that includes wrap-around care and intensive outpatient programs;
- Align payment policies to the needs of pregnant women, infants, and children; and
- Guarantee meaningful and ongoing stakeholder engagement.

If these needs are not addressed, many of the current problems that exist under TRICARE could remain under proposals to transfer enrollees to commercial health plans. One of the foundational problems with the current TRICARE program is its reliance on the Medicare model, an adult-based health care plan and payment system. Commercial insurance plans, while perhaps not as firmly linked to Medicare payment policy as TRICARE, are not entirely

unrelated to Medicare. In recent years, commercial plans have relied more heavily on Medicare's framework and policies, often to the detriment of the unique health needs of children. When resolving current system problems or crafting changes, careful consideration must be given to benefit design requirements, consistency, networks, regulation, and outcome measurement, in order to protect military families and the specific health needs of military connected children.

The TFK Coalition reiterates its appreciation for your leadership and would respectfully request, as both a next step in the TRICARE for Kids process, and in light of MCRMC proposals, a hearing specific to the impact on children of both the current system and any proposed changes. We look forward to following up with Committee staff to discuss further.

Thank you for working with the TFK Coalition, military families and the DoD to ensure that the current and any future military health system truly meets the unique health needs of children of military families.

Sincerely,

TRICARE for Kids Coalition

- American Academy of Pediatrics
- Children's Hospital Association
- Commission Officers Association
- Easter Seals
- Family Voices
- March of Dimes
- Military Child Education Coalition
- Military Family Advisory Network
- Military Kids Matter
- Military Officers Association of America
- Military Special Needs Network
- Military Spouse Behavioral Needs Clinicians
- National Association for Children's Behavioral Health
- National Military Family Association