

April 22, 2016

Via electronic mail

Ms. Sarah Brooks, Deputy Director
Health Care Delivery Systems
Department of Health Care Services
1500 Capitol Avenue
Sacramento, CA 95814

RE: 2016 CCI Program Proposals

Dear Ms. Brooks,

The Health Plan of San Mateo (HPSM) appreciates the opportunity to submit comments to the Department of Health Care Services (DHCS) about proposals outlined on the April 7, 2016 webinar to improve the Coordinated Care Initiative (CCI) and Cal MediConnect (CMC) programs. As you know, HPSM was the first California health plan to implement the CMC program in April, 2014; today, approximately 57% of all full-benefit dual eligibles in San Mateo County are enrolled in our local CMC program.

We commend DHCS staff for your ongoing commitment to improve the CCI program through a transparent stakeholder process and by evaluating program data and surveys, so that dual eligibles continue to receive more integrated, high-quality services in the future. We look forward to the feedback from stakeholders and seeing more information to support implementation. Also, HPSM will actively participate in any meetings to share best practices and learn lessons from other CMC plans.

HPSM supports all the proposed CMC program changes – some of which are already being implemented in San Mateo County. For example, HPSM already extends the continuity of care period for Medicare services to 12 months; HPSM already facilitates enrollment into CMC (streamlined enrollment proposal); and HPSM already extends the CMC deeming period for two months to help beneficiaries maintain their Medi-Cal eligibility and CMC enrollment. These three examples are invaluable components of our CMC program, and we strongly support their adoption in other CMC counties and health plans.

We specifically support the proposal allowing for a 2016 passive enrollment process for those dual eligibilities that did not already go through the process when CCI started. Our 2014 passive enrollment process in San Mateo County was very successful – of the approximately 3,000 beneficiaries that received notices, about 70% were passively enrolled into our CMC program. Surveys of beneficiaries throughout the CMC program report high satisfaction with care coordination, lower out-of-pocket costs, improved access to behavioral health, and integration of long-term services and supports. Another round of passive enrollment with the appropriate beneficiary protections in place would help grow enrollment and sustain the program beyond the demonstration years.

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For San Mateo County, we are prepared to send 90/60/30-day notices beginning June 1 to support passive enrollment start dates of September 1 and October 1, 2016. While other CMC counties may prefer a different schedule option, we feel two months is enough time to handle the estimated 1,600 beneficiaries that could be passively enrolled in San Mateo County.

Thank you again for sharing the proposed changes and we appreciate the opportunity to provide feedback. I can be reached at Maya.Altman@hpsm.org or 650-616-2145.

Sincerely,

A handwritten signature in blue ink that reads "Maya Altman". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Maya Altman
Chief Executive Officer