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From: Kelly Brooks-Lindsey [REDACTED]
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To: "Brooks, Sarah (EXE-DIR)@DHCS" [REDACTED]
Subject: comments on DHCS Final Rule Network Adequacy Proposal

Under the plan guidance section, there is no statement of how the state will issue guidance to counties participating in the Drug Medi-Cal-Organized Delivery System (DMC-ODS). A paragraph (each) is provided regarding managed care plan and county Mental Health Plan (MHP) guidance and feedback. For consistency and transparency purposes, recommend addition of a paragraph explaining how plan guidance for DMC-ODS will be provided.

There is an error - the document refers to DMC-ODS as a PIHP. My understanding – and the discussions that occurred in 2014 during the waiver development – is that DMC-ODS is a PAHP because DMC-ODS does not provide for inpatient services.

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