

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard, Mail Stop: S2-26-12  
Baltimore, Maryland 21244-1850



**Children and Adults Health Programs Group**

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Rene Mollow, MSN, RN, Deputy Director  
Health Care Benefits & Eligibility  
Department of Health Care Services  
1501 Capitol Avenue, MS 4000  
PO Box 997413  
Sacramento, CA 95899

Dear Ms. Mollow:

Thank you for your Children's Health Insurance Program (CHIP) State Plan Amendment (SPA), CA-14-0004, submitted on June 17, 2014. This SPA is related to application processing, eligibility screening, and enrollment. As you are aware, your SPA has been undergoing review by the Centers for Medicare and Medicaid Services (CMS). In order to proceed with the review of CA-14-0004, we find it necessary to seek additional information. The area of concern is related to Section 2107(e)(1)(O) of the Social Security Act (SSA), which requires that states have processes and procedures in place for enrollment simplification and coordination with state health insurance exchanges and Medicaid, including the use of a single application for all insurance affordability programs.

California has submitted the CS24, and indicated that it proposing to use both "an alternative single, streamlined application and a multiple benefits application." However, California recently informed CMS that the application for its Access for Infants and Mothers (AIM) program could not be integrated into California's single, streamlined application, or the California Healthcare Eligibility, Enrollment, and Retention System (CalHEERS) by July 1, 2014, as previously agreed upon as part of its mitigation strategy. The state also informed us that the County Children's Health Initiative Program (C-CHIP) continues to use a separate application(s). If the state is proposing to use title XXI program specific applications for AIM and C-CHIP in the interim period prior to full integration of these programs into the single, streamlined application that has been approved for Medicaid, the state must ultimately upload the relevant applications in the Medicaid Model Data Lab (MMDL) for our consideration. Given that CMS has not yet conducted a full review of these applications, we request that California initially submit the documents via email prior to uploading them in the MMDL so that we can provide technical assistance to the state prior to a formal submission.

In addition, and as we have discussed, California must submit a proposed mitigation strategy, and specific timeline for the completion of incorporating both the AIM and C-CHIP applications into CalHEERS. We also ask that the state provide a detailed explanation of the specific challenges associated with integrating the CHIP applications into the state's single, streamlined application. The detailed mitigation strategy should be submitted via email as a separate document, and the state should also remove the references to its mitigation strategy from CHIP

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SPA #20, submitted on June 26, 2014. We request that the state submit the mitigation strategy and applications no later than July 31, 2014.

Under section 2106(c)(2) of the Act, CMS must approve, disapprove or request additional information on a proposed amendment to a title XXI state plan within 90 days. This letter constitutes our notification that specified additional information is needed in order to fully assess your amendment. The 90-day review period has been stopped by this request and will resume as soon as a complete and substantive response to all of the items in this letter is received.

Please send your responses electronically to Ms. Victoria Collins, our subject matter expert in this area. Her contact information is as follows:

Centers for Medicare & Medicaid Services  
Center for Medicaid and CHIP Services  
7500 Security Boulevard, Mail Stop S2-01-16  
Baltimore, MD 21244-1850  
Telephone: (410) 786-2176  
Facsimile: (410) 786-5882  
E-mail: [Victoria.Collins@cms.hhs.gov](mailto:Victoria.Collins@cms.hhs.gov)

We appreciate the efforts of your staff and share your goal of providing quality health care to low-income, uninsured children through title XXI. If you have questions or concerns regarding the matters raised in this letter, your staff may contact Victoria Collins at (410) 786-2176. She will provide or arrange for any technical assistance that you may require. Thank you for your cooperation.

Sincerely,

Original Signed

Kelly Whitener  
Director  
Division of State Coverage Programs

cc:

John Ramey

Ernesto Sanchez

Hye Sun Lee, Acting Associate Regional Administrator, CMS Region 9