

COMMENT LOG: 1115 WAIVER PROPOSAL FOR 2015

Updated 12/12/14

DATE	TITLE	SUBMITTED BY	WAIVER TOPIC	MAJOR COMMENT TOPICS
Dec 12	Key Issues for Community Behavioral Health Providers	Rusty Selix Executive Director of Policy and Advocacy Mental Health Association in California	Input on Behavioral Health inclusion in Waiver	3 Key Objectives: Coordinated Physical Healthcare for adults and youth with severe mental illnesses and other chronic health care problems, Screening and Initiation of Behavioral Healthcare as identified for all individuals seen in primary care or emergency rooms, Include Section 1915 (i) elements such as transportation, employment support and respite care for individuals with severe mental illnesses
Nov 25	1115 Waiver 2015 Renewal Initiative Proposals	John Carvelli Executive Vice President LIBERTY Dental Plan	Input on inclusion of dental in Waiver	Proposes Dental Managed Care expansion beyond LA and Sacramento County programs
Nov 20	CBHDA's Proposal for California's 1115 Medicaid Waiver Renewal	Robert E. Oakes Executive Director California Behavioral Health Directors Association of California	Input on DSRIP / Whole Person Care / Drug Medi-Cal	Proposes a separate Behavioral Health DSRIP focused on reducing the morbidity and mortality of beneficiaries with serious mental illness. Incentive dollars would be tied to performance measures that can be jointly influenced by managed care plans and county mental health plans. Areas for shared accountability could include Inpatient and Emergency utilization, and Pharmacy. -Supports Drug Medi-Cal Organized Delivery System Demonstration [pursued under current 1115 Waiver] -Proposes Whole Person Care Pilots- Flexible care coordination programs for targeted Medi-Cal populations. FFP on non-traditionally covered Medicaid programs
Nov 12	ACLU of California Comments on CA's Proposed Section 1115 Medicaid Waiver Renewal	Kellen Russoniello, Staff Attorney - Health and Drug Policy, American Civil Liberties Union of California	Input on Medicaid funded shelter / Permanent supportive housing	Supports Medicaid funded shelter, permanent supportive housing in particular Medicaid funding for supportive housing can help address major public health issues of mental illness, substance use disorders and homelessness through the health system rather than the criminal justice system.

Nov 6	California's 1115 Waiver Renewal Concept Paper	Del Morris, MD President California Academy of Family Physicians	Input to Waiver Concepts: Workforce Development and Incentives Payment	Provides input on Workforce Development and Incentives Program concepts. Supports malpractice subsidy proposal. Also suggests loan repayment/scholarship programs as well as a graduate medical education (GME) pilot based on the existing Song Brown Program and another program modeled after the HRSA Teaching Health Center GME program. Recommends continuing DSRIP funding that expands primary care residency slots in public hospitals. Suggests add-on PMPM for primary care physicians serving significant proportion of low income patient population. Suggests supporting upfront investments for patient-centered medical homes.
Nov 14	CPCA Proposal for California's 1115 Medicaid Waiver Renewal	Carmela Castellano Garcia, Esq. President and CEO California Primary Care Association	Input to Waiver Concepts	Suggests using CalSIM grant opportunity, Section 2703 health homes savings, and waiver cost savings to develop a new Medi-Cal benefit for patients with complex conditions in health homes at clinics and health centers. Consider funding additional resources to clinics serving the safety net by drawing down federal match to fund Traditional Clinic Programs (estimate cost of \$52M). Supports FQHC APM, suggests sharing the savings back with the FQHCs and plans. Supports incentive programs/ P4P programs. Supports Medicaid funded shelter proposal. Suggests NY as a potential model. Workforce Development: supports malpractice insurance subsidy concept. Additionally, suggests focus on expanding specialty care access. Suggests new GME program at health centers with incentives for these programs increasing number of providers. Supports Fed/Shared savings, but is concerned with potential erosion of Medi-Cal rates and waiving of safeguard protections beneficiary access and benefits
Oct	Support Letter	Anne Kelsey Lamb, MPH,	Input into Waiver	Supports Children's Partnership proposal of Healthy Homes

29	for Housing and 1115 Waiver	Director Regional Asthma Management & Prevention (RAMP)	Concept, In-home asthma environmental remediation	for Asthmatic Children. Medi-Cal beneficiaries represent a high-risk pool for asthma. Environmental control measures can help avoid or eliminate onset. Recommends extending service to all counties rather than a small focused demonstration
Oct 21	Bridge to Reform Waiver Comments	Catherine K. Anderson, MPA National Vice President, State Programs UnitedHealthcare Community & State	Input to Waiver Concepts	Provides comments and recommendations on initial Waiver concepts. -Supportive of federal-state shared savings approach; recommends a competitive marketplace to drive quality/incentives; recommend moving towards a less fragmented system (FFS carve-outs, and county-based systems). - <i>Incentive Programs</i> : recommends measuring total cost of care and quality with clearly defined metrics, looking at measures plans/providers already has in place. - <i>FQHC payment reform</i> : supports risk-based models over volume-based reimbursement structure - <i>Housing/Shelter</i> : recommend offering room and board as an LTSS waiver benefit; stress importance of performance metrics in demonstrating connection between housing and health - <i>Workforce development</i> : 1) proposes maintaining PCP bump [ACA Section 1202] to providers who increase number of Medicaid beneficiaries seen by a certain percentage or over a period of time. 2) use Physician Extenders /CHWs to extend primary care access. 3) residency programs for medical students at FQHCs as a way to expand access.
Oct 13	CCHA Letter Regarding 1115 Waiver and CCS	Ann-Louise Kuhns President and CEO California Children's Hospital Association	Input to Waiver Concepts, Waiver Workgroup Participation Waiver Proposal:	Suggested removal of CCS Redesign from waiver. CCS redesign should improve care coordination while retaining access to CCS providers. Requests participation in 2 workgroups: CCS Redesign and Workforce Development. Also provided concept paper for an ACO model CCS design.

			CCS Regionalized Accountable Care Organizations	
Oct 13	Comments on California's Proposed 1115 Waiver Renewal Stakeholder Engagement Process	Anne McLeod Senior Vice President, Health Policy and Innovation California Hospital Association	Input to Waiver Concepts, Waiver Workgroup Participation	Noted appreciation that DHCS intent is to make behavioral-physical health integration strategies a subtopic of workgroup efforts. Requests participation in 5 workgroups: federal-state shared savings, MCO/Provider Incentive programs, DSRIP II, Medicaid-Funded Shelter, and Workforce Development. Ask to be included in not just through stakeholder involvement, but in the core thinking, development and refinement
Oct 10	Waiver renewal proposal: Healthy Homes for Asthmatic Children	Kristen Golden Testa Director, California Health Care Program Children's Partnership	Input to Waiver Concepts, Waiver Workgroup Participation Waiver Proposal: Healthy Homes for Asthmatic Children	Requests participation on 1 workgroup: Workforce Development. Proposes "Healthy Homes for Asthmatic Children" for waiver related to Hosuing proposal. Objective is to show home interventions can reduce asthma attacks, Medical visits, health costs, and provide a methodology for measuring the health impacts of home remediation.
Oct 7	Section 1115 Waiver Renewal - Workgroups - UC Letter	John D. Stobo, MD Senior Vice President Health Services and Sciences Office of the President University of California	Input to Waiver Concepts, Waiver Workgroup Participation	Expressed support of stakeholder process and smaller workgroup structure of impacted entities. UCs have expertise in managed care contracting, DSRIP, and academic health science training. Request participation on 6 workgroups: federal-state shared savings, safety net payment reform/DSH/SNCP bundled payment, DSRIP II, MCO/Provider Incentive Programs, Medicaid-funded Shelter, and Workforce Development.
Oct 6	PEACH 1115 Waiver Stakeholder Comment letter	Catherine K. Douglas President and CEO Private Essential Access Community Hospitals	Input to Waiver Concepts, Waiver Workgroup Participation	Support concept of federal-state shared savings to promote whole-person, coordinated care. Recommends Federal/State shared savings be used to fund a DSRIP for Private DSH hospitals. Requests participation on 3 workgroups: federal-state shared savings, DSRIP II, and the MCO/Provider Incentive Programs.

Sept 30	Nurse Family Partnership	Christopher S. Krawczyk, Ph.D California State Director Nurse-Family Partnership National Service Office	Input to Waiver Concepts: Nurse-Family Partnership Technical Work Group Participation:	Propose inclusion of NFP in the California 1115 Waiver so the medical community can receive Medi-Cal support and so the State and local partners can share in the cost-savings of NFP and benefit from the demonstrated performance improvement outcomes of NFP. Support at the federal level for a Waiver that includes NFP is highly likely given that NFP is part of the 1115 Waiver in New York and Texas.
Sept 15	Comments for DHCS on 1115 waiver renewal	Rachel McLean, MPH Viral Hepatitis Prevention Coordinator/ STD Healthcare Policy Analyst STD Control Branch California Department of Public Health	Input to Waiver Concepts	These comments are informed by consultation with community partners with a particular expertise in serving persons living with and at risk for HIV and viral hepatitis, homeless individuals, and persons with mental health and substance use disorders, including persons who use injection drugs and face many barriers to accessing care We support the integration of behavioral health services into primary care settings. We support the use of Medi-Cal for shelter We support the use of group visits and telehealth for increasing access to care
Sept 12	<i>Opportunities for Whole Person Care in California</i> Report by JSI; 9/14	Sarah Muller California Association of Public Hospitals	Medicaid shelter and Whole Person Care.	Document provided as follow up to comments by Erica Murray at 9-11-14 SAC meeting. http://safetynetinstitute.org/wp-content/uploads/sites/2/2014/09/BCSF-Final-Report-Opportunities_20140905-Final.pdf
Sept 10	2015 1115 Waiver	Stephen C. Clark Director District Hospital Leadership Forum California's 43 non-designated public hospitals	Input to Waiver Concepts; DSRIP	Comments on: DSRIP goals for hospitals; consider general fund investment in the Waiver, incentive funds to transform systems; expanding behavioral health Services; strengthening coordinated systems of care; improving outcomes related to patient experience and quality of care provided; expanding chronic disease management

Sept 10	Task Force Comments on California's Concept for 1115 Waiver Renewal	Amber Kemp, MBA Vice President, Health Care Coverage California Hospital Association on behalf of: California Hospital Association (CHA), the California Association of Public Hospitals and Health Systems (CAPH), Los Angeles County Department of Health Services, Private Essential Access Community Hospitals, Inc. (PEACH), the California Children's Hospital Association (CCHA), the University of California medical centers and the District Hospital Leadership Forum (DHLF).	Input to Waiver Concepts	Comments on: Increasing Federal Funding Consider general fund investment in the Waiver Waiver Concepts Incentive Payment Programs Delivery System Reform Incentive Payments (DSRIP) California Children's Services (CCS) Program Improvements Shelter and Workforce Initiatives FQHC Payment/Delivery Reform
Aug 27	Assuring Health Access, Integration, and Equity for All California Residents	SEIU State Council 1115 Waiver Principles	Input to Waiver Concepts	Five principles to guide development of the next 1115 Waiver: <ol style="list-style-type: none"> 1. Maximize federal funding of public hospital systems to ensure access. 2. Cover the full cost of providing comprehensive health care services, including primary and preventive care, to the uninsured to ensure equity. 3. Funding designated public hospitals should be the priority of the Waiver, however if other providers or health plans take part in the waiver they must put up their own funds to match federal waiver dollars to ensure fairness. 4. Support increased coordination between county medical, behavioral, and social services, and between county health systems, in-home supportive services, and community-based care to ensure

				<p>integration.</p> <p>5. Provide significant funding for workforce training and development to ensure transformation</p>
Aug 12	1115 Waiver Stakeholder Process	Michael Schrader CEO, CalOptima	Input to Stakeholder and Technical Work Group Participation	<p>Comments in consideration of being included in Stakeholder Committee and Technical Work Groups on the following subjects:</p> <ul style="list-style-type: none"> • Payment/Delivery Reform Incentive Payment Programs; • Safety Net Payment Reforms; • FQHC Payment/Delivery Reform; • Children with special health care needs/California Children's Services (CCS) Program improvements; • Shelter for Vulnerable Populations; and • Workforce Development.
Aug 11	Proposal for California's 1115 Medicaid Waiver Renewal	Erica B. Murray President and CEO California Association of Public Hospitals and Health Systems	CAPH Waiver Proposal	<p>CAPH Proposal includes four elements:</p> <ol style="list-style-type: none"> 1. A Successor DSRIP that Rewards Improvement, Health and Value 2. Testing of Innovative Care Models that Improve Quality and Outcomes and Contain Costs 3. Payment Reforms that Ensure Access to Safety Net Services 4. A Waiver that Offers the Opportunity to Earn Federal Dollars at Existing Levels
Aug 11	CAPH Input to California's 1115 Medicaid Waiver Renewal Concepts	Erica B. Murray President and CEO California Association of Public Hospitals and Health Systems	Input to Waiver Concepts; Clarification Questions	<p>Comments on:</p> <p>Strengthen the DSRIP through a successor program that is more standardized, with a heavier emphasis on outcomes; payment reforms for the remaining uninsured; voluntary county pilots that would integrate physical and behavioral health services, and provide robust coordination with social, housing, vocational training and other services critical to holistically addressing the needs and care of targeted high-</p>

				risk patients; advance alternatives to FQHC PPS payments in a way that transforms payments while expanding access to services;
July 30	Suggestion for Stakeholder Participation	Suzanne Jacobson, CPA Deputy Director/Chief Financial Officer Santa Barbara County Public Health Department	Input to Stakeholder Participation	<p>Include input from the 6 <i>Clinic Counties</i> (those counties that operate clinics, but not public hospitals). While we are members of CHEAC and enjoy our organizational representation as Health Departments from the excellent leadership of Judith Reigel, we are not members of the CPCA and would like a voice as publicly administered FQHCs.</p> <p>Perhaps we could be allowed to participate in or give input into the sub-workgroups on FQHC and safety net payment aspects of the waiver?</p>
July 23	Input into CA's 1115 Medicaid Waiver Renewal Concepts	Andrew Deckert, MD, MPH, Health Officer, Shasta Co HHSA— Public Health	Input to Waiver Concepts- Workforce Development	<p>Needs to address not only access to health care insurance but also to actual health care providers willing to see new patients.</p> <p>The concept paper cover a portion of medical malpractice idea for existing docs to see low-income is fine but still does not address need for additional primary care providers. Most of our primary care providers were full before ACA, now several practices have closed (retirement) or closed their practice to new patients. The main challenge is sufficient providers to see the increased patients.</p>