

November 25, 2024

To: Tribal Chairpersons, Designees of Indian Health Programs, and Urban Indian Organizations

Subject: Notice of Proposed Change to the Medi-Cal Program

The purpose of this letter is to provide information regarding a proposed change to the Department of Health Care Services' (DHCS) Medi-Cal Program that will be submitted to the Centers for Medicare and Medicaid Services (CMS). DHCS is forwarding this information for your review and comment.

DHCS is required to seek advice from designees of Indian Health Programs and Urban Indian Organizations on Medi-Cal matters having a direct effect on Indians, Indian Health Programs or Urban Indian Organizations per the American Recovery and Reinvestment Act of 2009 (ARRA). DHCS must solicit the advice of designees prior to submission to CMS of any State Plan Amendment (SPA), waiver requests or modifications, or proposals for demonstration projects in the Medi-Cal program.

Please see the enclosed summary for a detailed description of this DHCS proposal.

QUESTIONS AND COMMENTS

Indian Health Programs and Urban Indian Organizations may also submit written comments or questions concerning this proposal within 30 days from the receipt of notice. Comment may be sent by email to Angeli.Lee@dhcs.ca.gov or by mail to the address below:

Contact Information

Department of Health Care Services
Director's Office
ATTN: Angeli Lee
MS 0000
P.O. Box 997413
Sacramento, CA 95899-7413

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and Urban Indian Organizations

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In addition to this notice, DHCS plans to cover this SPA in the next quarterly Medi-Cal Indian Health webinar. Please note that Tribes, Indian Health Programs, and Urban Indian Organizations may request a consultation on this proposal at any time as needed.

Sincerely,

Original signed by Emily Tillisch for

Andrea Zubiarte, Chief
Office of Tribal Affairs
Department of Health Care Services

Enclosure



Department of Health Care Services (DHCS) Tribal and Designees of Indian Health Programs Notice

PURPOSE

To seek federal approval to add Certified Wellness Coach (CWC) as a covered Medi-Cal benefit.

BACKGROUND

Highlighted by California's Governor Newsom as a part of California's Master Plan for Kids' Mental Health¹, the Children and Youth Behavioral Health Initiative (CYBHI)² is a multiyear, multi-department package of investments that reimagines the systems that support behavioral health for all of California's children, youth, and their families, regardless of payer. As part of the CYBHI, the Department of Health Care Access and Information (HCAI) is responsible for developing a new category of behavioral health provider, "behavioral health coach." Behavioral health coaches are currently known as a CWC. CWCs are trained and certified providers intended to help address the unmet mental health and substance use needs of children and youth³.

The Department of Health Care Services (DHCS) will submit State Plan Amendment (SPA) 24-0032 to the Centers for Medicare & Medicaid Services (CMS) to seek federal approval to adopt CWC as a new state plan benefit. The proposed effective date of this SPA is January 1, 2025.

DHCS is proposing to add CWC services as a preventive service⁴ to help increase the state's overall capacity to provide prevention and early intervention supports and services that can support the behavioral health and well-being of Medi-Cal members in California in a wide variety of settings, such as health centers, schools, and in the community. CWCs support the development of a larger, more representative behavioral health workforce, providing individuals with increased support from people who they can connect with, who speak their language, understand their communities, and work in places that are convenient to Medi-Cal members. Through wellness promotion, screening, and crisis referral, CWCs help make behavioral health supports more inclusive and readily available to Medi-Cal members, bridging the crucial gap between need and accessibility.

SUMMARY OF PROPOSED CHANGES

SPA 24-0032 proposes the following changes:

- Add CWC services as a new state plan preventive service to support non-clinical behavioral health needs and well-being of Medi-Cal members.
- Add CWCs that may provide the following services:
 - Wellness promotion and education.

¹ [Governor Newsom's Master Plan for Kids' Mental Health](#)

² [California Welfare and Institutions Code section 5961](#)

³ [California Health and Safety Code section 127825](#)

⁴ [42 CFR 440.130\(c\)](#)

- Screening that does not require a license.
 - Care coordination including navigation services.
 - Individual and group counseling, including wellness education, coping skills, goal setting and planning, teaching life skills, stress management, and problem solving.
 - Crisis referral, including identifying potential risk, providing emotional support, and engaging in warm handoffs with licensed, credentialed, or associate behavioral health providers.
- Require that CWCs be supervised by licensed behavioral health practitioner.

IMPACT TO TRIBAL HEALTH PROGRAMS (THPs)

THPs may use CWCs to provide services, but CWCs are not considered THP billable providers. Therefore, CWC services are not considered billable encounters and will not be eligible for reimbursement at the federal All-Inclusive Rate (AIR). Reimbursement for CWC services will be available at fee-for-service (FFS) rates outside of the Office of Management and Budget Indian Services per visit rate for Tribal 638 clinic providers. To the extent that THPs provide CWC services, an increase in Medi-Cal members that access the services within THPs may occur.

IMPACT TO FEDERALLY QUALIFIED HEALTH CENTERS (FQHCs)

CWCs are not considered FQHC practitioners, so their services are not billable Prospective Payment System (PPS) visits. Additionally, FQHCs cannot receive reimbursement for CWC services at the Medi-Cal FFS rate. However, FQHCs can submit a Change in Scope-Of-Service Request (CSOSR) to DHCS to include CWC services in their PPS rate reimbursement if they meet the specified requirements noted in subdivision (e) of Welfare and Institutions Code section 14132.100.

IMPACT TO AMERICAN INDIAN MEDI-CAL MEMBERS

Medi-Cal members may have increased access to this benefit, which is expected to improve health outcomes for members receiving these services.

RESPONSE DATE

Indian Health Programs and Urban Indian Organizations may also submit written comments or questions concerning this proposal within 30 days from the receipt of notice. Comments may be sent by email to Angeli.Lee@dhcs.ca.gov or by mail to the address below:

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