



January 12, 2024

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

**Subject:** Notice of Intent to Submit an Amendment to the CalAIM Section 1115 Demonstration to Authorize Continuous Coverage for Children

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 & 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 American 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 Amendments (SPAs), waiver requests or amendments, 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**

Tribes and Indian Health Programs may also submit written comments or questions concerning this proposal within 30 days from receipt of notice. To be assured consideration prior to submission to CMS, comments must be received no later than 11:59 PM (Pacific Time) on February 12, 2024. Please note that comments will continue to be accepted after February 12, 2024, but DHCS may not be able to consider those comments prior to the initial submission of the CalAIM Section 1115 Continuous Coverage for Children application to CMS. Comments may be sent by email to [1115waiver@dhcs.ca.gov](mailto:1115waiver@dhcs.ca.gov) or by mail to the address below:

Department of Health Care Services  
Director's Office  
Attn: Lindy Harrington and René Mollow  
P.O. Box 997413, MS 0000  
Sacramento, California 95899-7413



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and Urban Indian Organizations

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In addition to this notice, DHCS plans to cover this Section 1115 demonstration amendment request during a tribal webinar on February 2, 2024 at 2:00 – 3:00 PM PT.

Please note that Indian Health Programs and Urban Indian Organizations may request a consultation on this proposal at any time as needed.

Sincerely,

Original Signed By

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

Enclosure



## Department of Health Care Services Tribal and Designees of Indian Health Programs Notice

### **PURPOSE**

To provide notice of DHCS' intent to (1) submit to the federal Centers for Medicare & Medicaid Services (CMS) an amendment to the California Advancing and Innovating Medi-Cal (CalAIM) Section 1115 demonstration to provide continuous coverage for children ages zero to four; and (2) to request feedback on the Section 1115 demonstration amendment proposal described in this notice.

### **BACKGROUND**

California seeks to ensure that all children residing in the State have sustained and reliable access to the services and treatment needed to promote optimal health and well-being. To advance this goal, DHCS is seeking an amendment to the CalAIM Section 1115 demonstration to provide continuous coverage in Medicaid (Medi-Cal) and the Children's Health Insurance Program (CHIP) for eligible children through age four.

To implement this change, DHCS is requesting to amend the CalAIM Section 1115 demonstration to receive federal funding to provide continuous coverage for children through the end of the month of their fifth birthday. They would remain covered under Medi-Cal or CHIP, regardless of when they first enroll in Medi-Cal or CHIP, and regardless of changes in circumstances that would otherwise cause them to lose coverage. Implementation of this policy is contingent on a State determination of available State General Fund resources in 2024 – 2025 and subsequent fiscal years and CMS approval.

### **SUMMARY OF PROPOSED CHANGES**

Ensuring access to appropriate health care in a timely manner is vital for young children since the care received during the first few years of life significantly impacts health and well-being. Medi-Cal and CHIP play significant roles in ensuring this access, serving as a central source of health insurance coverage for nearly 40 percent of the State's children.<sup>1</sup>

However, Medi-Cal and CHIP-eligible children often go through short periods of disenrollment and re-enrollment in Medi-Cal coverage, often leading to gaps in coverage. People who experience this are more likely to delay or not receive needed care, receive less preventive care, stop filling their prescriptions, and have more emergency department visits.

DHCS is seeking to provide continuous coverage in Medicaid and CHIP for children through age four. The approach will help reduce gaps in Medi-Cal and CHIP coverage

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<sup>1</sup> Finocchio, L., Paci, J., Newman, M., Blue Sky Consulting Group. (2021, August). *Medi-Cal Facts and Figures: Essential Source of Coverage for Millions*. <https://www.chcf.org/wp-content/uploads/2021/08/MediCalFactsFiguresAlmanac2021.pdf>

for young children, including for American Indian and Alaska Native enrollees who are disproportionately impacted.

During the continuous coverage period, there will be no formal triggering of annual redeterminations for children ages zero through four. Redetermination or termination of a child's Medi-Cal or CHIP coverage will only occur if the child moves out of California or the service area, requests to terminate their coverage, dies, or the agency determines that eligibility was granted in error.

### **IMPACT TO TRIBAL HEALTH PROGRAMS**

The proposed CalAIM Section 1115 demonstration amendment is expected to have no impact on services a tribal health program provides, or plans to provide. By providing continuous Medi-Cal and CHIP coverage to children through age four, the proposed amendment may improve care continuity and reduce disruptions in care for children, including for care provided by tribal health programs.

### **IMPACT TO FEDERALLY QUALIFIED HEALTH CENTERS (FQHCs)**

The proposed amendment will have no direct impact to FQHCs since DHCS is not proposing changes to FQHC services, rates, eligibility, or any other related requirement authorized by this demonstration authority or the Medi-Cal State Plan. By providing continuous coverage to children through age four, the proposed amendment may improve care continuity and reduce disruptions in care for children, including for care provided by FQHCs.

### **IMPACT TO INDIAN MEDI-CAL BENEFICIARIES**

This proposal will provide continuous coverage to American Indian and Alaska Native children ages zero to four who enroll in Medi-Cal or CHIP beginning on the effective date of the child's most recent eligibility determination or redetermination and extending through the end of the month of their fifth birthday. DHCS anticipates the amendment will ensure continuous coverage, reduce gaps in coverage, promote access to and continuity of health care services, and improve health outcomes for American Indian and Alaska Native children who are enrolled in Medi-Cal or CHIP.

### **RESPONSE DATE**

Tribes and Indian Health Programs may also submit written comments or questions concerning this proposal within 30 days from the receipt of notice. To be assured consideration prior to submission of the CalAIM Section 1115 Continuous Coverage for Children amendment to CMS, comments must be received no later than 11:59 PM (Pacific Time) on Monday, February 12, 2024. Please note that comments will continue to be accepted after February 12, 2024, but DHCS may not be able to consider those comments prior to the initial submission of the CalAIM Section 1115 Continuous Coverage for Children amendment to CMS.

Comments may be sent by email to [1115waiver@dhcs.ca.gov](mailto:1115waiver@dhcs.ca.gov) or by mail to the address below.

DHCS will host a webinar to solicit Tribal and Indian Health Program stakeholder comments. The webinar will have online video streaming and telephonic conference capabilities to ensure accessibility.

- Friday, February 2, 2024 – Tribal and Designees of Indian Health Programs Webinar for Continuous Coverage for Children Application
  - 2:00 – 3:00 PM PT
  - Register for Webex conference:  
<https://dhcs.webex.com/weblink/register/r75f0ebfa827fce554bcbac77df7cc2d>
    - Please register in advance to receive your unique login details and link to add to your calendar
  - Call-in information
    - Phone Number: 1-415-655-0001 (US Toll)
    - Access Code: 2664 048 2702
    - Callers do not need an email address to use the phone option and do not need to register in advance

## **CONTACT INFORMATION**

If Tribes and Indian Health Programs would like to view the CalAIM Section 1115 Continuous Coverage for Children amendment or notices in person, they may visit their local county welfare department (addresses and contact information are available at: <https://www.dhcs.ca.gov/services/medi-cal/Pages/CountyOffices.aspx>). Tribes and Indian Health Programs may also request a copy of the proposed application, notices, and/or a copy of the submitted public comments related to the CalAIM Section 1115 Continuous Coverage for Children amendment by submitting a request to the mailing address listed below or via email to [1115waiver@dhcs.ca.gov](mailto:1115waiver@dhcs.ca.gov).

Written comments may be sent to the following address; please indicate “CalAIM Section 1115 Continuous Coverage for Children Amendment” in the written message:

Department of Health Care Services  
Director’s Office  
Attn: Lindy Harrington and René Mollow  
P.O. Box 997413, MS 0000  
Sacramento, California 95899-7413