

State of California—Health and Human Services Agency Department of Health Care Services



February 28, 2020

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Mr. James G. Scott, Director Centers for Medicare & Medicaid Services Medicare and CHIP Operations Group Division of Program Operations 601 East 12th Street, Suite 0300 Kansas City, MO 64106-2898

CALIFORNIA MEDI-CAL 2020 DEMONSTRATION AMENDMENT REQUEST FOR THE GLOBAL PAYMENT PROGRAM AND PACE ENROLLMENT IN ORANGE COUNTY

Dear Ms. Garner, Ms. Ross, and Mr. Scott:

The State of California proposes to amend the Special Terms and Conditions (STCs) for the "Medi-Cal 2020 Demonstration," project number 11-W-00193/9 to authorize the changes described below. Please see the proposed changes enclosed to Section VII. Demonstration Delivery Systems and STCs 165, 167, 170, 172, 180, and Attachments P, EE, FF, and NN.

This proposed amendment would allow the Department of Health Care Services (DHCS) to operate an additional six-month Global Payment Program (GPP) program year (PY) for the service period of July 1, 2020 to December 31, 2020 (PY 6A). This amendment would also allow Medicaid beneficiaries in Orange County at their election to be disenrolled from

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CalOptima, a county-organized health system (COHS) including CalOptima PACE, to be enrolled in a Program of All Inclusive Care for the Elderly (PACE) organization not affiliated with CalOptima, if eligible.

DHCS is requesting an effective date of July 1, 2020, for this amendment. DHCS is prepared to collaborate with the Centers for Medicare and Medicaid Services (CMS) in order to secure prompt approval of this amendment.

Background

GPP establishes a statewide pool of funding for California's remaining uninsured by allocating over \$2 billion of combined federal Disproportionate Share Hospital (DSH) allotment and uncompensated care funding to Public Health Care Systems (PHCS). These funds support PHCS efforts to provide health care for California's uninsured population and promotes the delivery of more cost-effective and higher-value care to the uninsured. This amendment is necessary to continue GPP payments, using only the applicable federal DSH allotment funds for the relevant time period, to eligible PHCSs through the final six months of the Medi-Cal 2020 Demonstration period.

PACE is a fully integrated Medicare and Medicaid delivery model that coordinates and provides all needed preventive, primary, acute and long-term care services for eligible participants to continue living in the community. Currently all Medicaid beneficiaries in Orange County are enrolled in CalOptima, the COHS in that county, and may not be enrolled in any other alternative delivery system without prior approval from CMS. New PACE programs are currently being established in Orange County, pending approval from CMS. This amendment is necessary to allow for the enrollment of Medi-Cal beneficiaries in PACE not operated or subcontracted by CalOptima. The amendment will increase beneficiary access to PACE services in Orange County, and is supported by CalOptima.

Impact to Services

The proposed amendment will extend GPP services through the final six months of the Medi-Cal 2020 Demonstration period and allow Orange County beneficiaries to opt into PACE as a delivery system alternative to COHS enrollment.

Waiver Authority

DHCS believes the existing waiver authorities in the Medi-Cal 2020 Demonstration are sufficient to authorize this proposed amendment. To the extent necessary, DHCS requests that these authorities are extended to the amendments contained in this request.

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Expenditure Authority

With respect to GPP, the Department is proposing to extend the relevant Expenditure Authority to allow for GPP payments for the final six months of the approved Demonstration term July 1, 2020, through December 31, 2020. Note these proposed GPP payments would only consist of the applicable federal DSH allotment for the period.

Public Notice and Tribal Notice

Pursuant to STCs 8 and 17, DHCS has provided public notice, and continues to solicit stakeholder input through the following means:

DHCS has provided public notice of the amendment concept and its effect to the public through collaborative stakeholder meetings, stakeholder calls, and public notice posted to the DHCS website.

CMS approved DHCS' request for No Tribal Notice on February 21, 2020.

Budget Neutrality

This proposed amendment will not impact the Demonstration budget neutrality.

Evaluation Design

This proposed amendement will not impact the GPP evaluation design. There is no applicable evaluation design specific to PACE/COHS.

Thank you for your support and consideration. DHCS is happy to assist you and your staff in any way as you review the proposed Demonstration amendment. If you have any questions, please contact Lindy Harrington, Deputy Director of Health Care Financing at Lindy-Harrington@dhcs.ca.gov or (916) 345-7528.

Sincerely,

Jacey Cooper
Chief Deputy Director
Health Care Programs
State Medicaid Director

Enclosures cc: See Next Page

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