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July 3, 2015

Ms. Jennifer Kent, Director  
California Department of Health Care Services  
1500 Capitol Avenue  
Sacramento, CA 95814

**Re: Comments on the California Children's Services Redesign Proposal – Whole Child Model – June 11, 2015**

Dear Director Kent:

The California State Association of Counties (CSAC), representing California's 58 counties, is writing to provide formal comments on the Department of Health Care Services' (DHCS) proposal for the California Children's Services (CCS) Program Redesign – The Whole Child Model – released on June 11, 2011.

Counties support efforts to redesign the CCS program with the goal of continuing to provide timely care and services for these most critically ill children. Continuity of care and program integrity are of primary concern for CSAC in any effort to redesign the CCS program.

We appreciate the hard work and commitment of DHCS staff on this proposal and the opportunity to provide input. Moving forward, counties will monitor and engage on the following issues and concerns:

*Section 1. Whole Child Delivery Model*

While the Health Plan of San Mateo has had success as a fully integrated model, the question of whether that model can be replicated in other counties and an exploration of potential administrative challenges has yet to be conducted. The diversity of each county and health system, as well as the needs of CCS program participants, requires careful planning and clear, timely guidance from the Department as this effort moves forward.

*Section 4. CCS Program Improvement and Stakeholder Engagement*

CSAC commends the CCS Advisory Group for the work they have done to date. The proposal designates the CCS Advisory Group as the Redesign Stakeholder Advisory Board, with no new members. CSAC respectfully requests the opportunity to be added as member of this Advisory Board. The CSAC representative would be tasked with providing a broad county perspective and contributing to the Stakeholder Advisory Board in a meaningful way. We believe a CSAC member would complement the expertise of the current county colleagues who are members of the Board.

*Section 5. County Roles, including Medical Therapy Program*

The Whole Child Model shifts the responsibility for CCS care coordination and service authorization activities from the counties to the health plans. Counties will retain the responsibility for initial and periodic financial, residential and medical eligibility. These roles are often linked to one another and in many counties are performed by the same staff.

Counties are concerned with the potential impacts to county staffing, continuity of care, and other administrative concerns potentially created by this proposal.

Additionally, under this proposal, the Medical Therapy Program (MTP) will remain the responsibility of counties. In order to more fully understand the proposal and its potential impacts, additional details regarding the Department's vision for how the MTP program may be impacted by this proposal are needed.

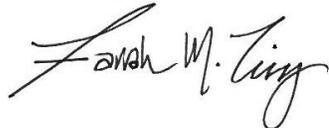
Section 6. Proposed Timeline

The proposed timeline suggests that each phase of implementation will be followed by an assessment. CSAC urges DHCS to incorporate flexibility into the timeline and to use initial and ongoing assessments to inform the appropriateness of proceeding with the next phase of implementation. We believe a prudent and careful approach is critical to preventing disruptions in care, responsibilities, and funding.

CSAC wishes to thank you for the opportunity to weigh in on the CCS Redesign proposal and for the Department's work and commitment to CCS. While the Administration has chosen to proceed with the Whole Child Model, CSAC and counties remain open to exploring additional models or ideas and would welcome further discussions as warranted. Again, we want to thank you and your staff for their dedication and attention to this issue.

Should you have any concerns regarding our comments, please feel free to contact me at (916) 650-8110 or [fmcdaid@counties.org](mailto:fmcdaid@counties.org). Thank you.

Sincerely,



Farrah McDaid Ting  
Legislative Representative

cc: Anastasia Dodson, Associate Director of Policy, Department of Health Care Services  
Kiyomi Burchill, Deputy Secretary for Legislative Affairs, California Health and Human Services Agency  
Diane Cummins, Special Advisor to the Governor, Department of Finance  
Louis Rico, Chief, Systems of Care Division, Department of Health Care Services  
Judith Reigel, Executive Director, County Health Executives Association of California