



September 10, 2015

Ms. Jennifer Kent
Director
California Department of Health Care Services
VIA Email

RE: DHCS "CCS Redesign Whole Child Model" Proposal

Dear Ms. Kent:

Sharp HealthCare (Sharp) is San Diego's largest private employer, largest provider of health care including care to the Medi-Cal population and operates three hospitals where women receive extraordinary maternity care. Two of these hospitals, Sharp Grossmont and Sharp Mary Birch also operate Neonatal Intensive Care Units, with Mary Birch the largest NICU in the region. These facilities and Sharp-affiliated physicians receive reimbursement for care to the CCS population.

I understand that San Diego County will not be among the first to implement the CCS Redesign and that its current CCS structures will remain in place. While implementation in San Diego is assumedly several years off and contingent upon lessons learned from other counties, it is important that the Department's CCS Redesign Whole-Child Model (CCS Redesign) be clarified to ensure there are not unintended consequences for Sharp NICUs. The proposal as drafted is silent on the matter of NICUs, and we assume the intent is that they would be part of health plans' provider networks. We ask that this be clarified with the additional explication that it is imperative that women be provided choice during this critical life event.

Another consideration is the recently operationalized Rady Children's Hospital CCS ACO (Rady ACO) that the state has requested continue under the 1115 Waiver. While Sharp does not provide CCS care to children with the conditions covered by the Rady ACO, it is imperative that this ACO not be presumed to be the model for future care for an expanded population beginning at birth. Again, the main concern is that women in San Diego continue to have options for delivery of their babies and that Sharp receives NICU reimbursement that allows for adequate capacity of these specialized NICU resources.

In addition, Sharp Grossmont Hospital is the site of the busiest Emergency Department (ED) in San Diego County reflecting the lack of other acute services in the urban/rural interface of San Diego's East County. Many children arrive at this ED in need of Acute Pediatric Services and

SHARP ORGANIZATIONS

Sharp HealthCare ■ Sharp Memorial Hospital ■ Sharp Grossmont Hospital ■ Sharp Chula Vista Medical Center
Sharp Coronado Hospital and Healthcare Center ■ Sharp Mesa Vista Hospital ■ Sharp Mary Birch Hospital for Women & Newborns
Sharp McDonald Center ■ Sharp Rees-Stealy Medical Centers ■ Sharp Health Plan
Sharp HealthCare Foundation ■ Grossmont Hospital Foundation

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Sharp receives CCS for some of these children. Sharp's ability to provide Acute Pediatric and Normal OB and high risk Perinatology/NICU is so important to East County residents that the terms of our lease agreement with the Grossmont Healthcare District stipulate these services.

Sharp's integrated health care system has a long and successful history of meeting the health care needs of a diverse population under a managed care model. We agree with the Department's assessment that providing a Whole-Child model will result in improved patient care and improved financial stewardship of public health care expenditures. Of course, mechanisms must be in place to ensure patient access to necessary services and high quality health care.

We appreciate the opportunity to provide these comments and look forward to working with you as the CCS Redesign is implemented.

Sincerely,

A handwritten signature in black ink, appearing to read "Sara Steinhoffer". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Sara Steinhoffer
Vice President, Government Relations
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