



California Health & Wellness Investment Plan – Imperial County

HOUSING AND HOMELESSNESS INCENTIVE PROGRAM

September 30, 2022



MCP INFORMATION

Provide the name and contact information for the MCP submitting this IP response.

MCP Name	California Health & Wellness
Lead Contact Person Name and Title	Deanna Eaves, Director, Compliance Sally Chow, Senior Manager, Compliance
Contact Email Address	deanna.l.eaves@cahealthwellness.com sally.c.chow@cahealthwellness.com
Contact Phone	Deanna Eaves: 916-935-1275 Sally Chow: 916-935-8157

PART I: INVESTMENTS

To determine local HHIP investment opportunities, California Health & Wellness and our Plan Partner collaborated with the Imperial Valley Continuum of Care Council, which serves Imperial County. The costs listed below were determined based on conversations with the CoC and our Plan Partner and are apportioned to Imperial County based on Medi-Cal membership in the county.

Investment Activity	Gap or Need Addressed	Description (2 – 3 sentences for each activity)	Dollar Amount or Range	Recipient(s) or Recipient Type(s)	Timeline	HHIP Measure(s) Impacted	Domain Targeted
1. Supporting the Point in Time (PIT) Count	During an MCP and CA-613 meeting on September 6, the Imperial Valley Continuum of Care Council (IVCCC) identified having insufficient resources to complete the 2023 PIT Count.	Funds will support CA-613 IVCCC with the staffing, volunteer recruitment, and incentives to ensure complete geographic coverage for the 2023 PIT Count.	\$40,500	CA-613 Imperial Valley Continuum of Care Council (IVCCC)	10/2022 – 1/2023	1.1	Provider/ Partner Infrastructure
2. Supporting the CoC Infrastructure and the Place Value Assessment Tool Pilot Program	During MCP and CA-613 meetings on September 6 and 19, IVCCC identified infrastructure needs to support CalAIM implementation and operate an ongoing pilot program using a new place value assessment tool that uses a score-based referral decision to	Funds will support CA-613 IVCCC in enhancing their infrastructure and capacity to support CalAIM coordination and activities (i.e., Coordinated Entry System). Funds will also help IVCCC expand their current	\$364,500	CA-613 Imperial Valley Continuum of Care Council (IVCCC)	10/2022 – 12/2023	1.2, 1.6, 2.2, 3.1	Provider/ Partner Infrastructure

	streamline individual and family risk screenings and placements within the Coordinated Entry System. The pilot program is slated to end in November 2022.	capacity and staffing needs to conduct more screenings using the new place value assessment tool and implement pilot learnings within the broader community.					
3. Supporting HMIS Infrastructure	During an MCP and CA-613 meeting on September 6, IVCCC identified insufficient staffing and technology infrastructure to support CalAIM data sharing requirements. Similarly, California Health & Wellness needs to gain HMIS access to meet HHIP requirements.	Funds will support CA-613 IVCCC in enhancing their HMIS infrastructure and capacity to ensure favorable HHIP measure performance. This includes user fees, database trainings and MOUs, and data integrity and privacy. Funds will also support similar costs tied to California Health & Wellness gaining HMIS access.	\$202,500	CA-613 Imperial Valley Continuum of Care Council (IVCCC) and California Health & Wellness	10/2022 – 12/2023	1.2, 2.2	MCP and Provider/ Partner Infrastructure
4. Supporting	During an MCP and	Funds will support	\$405,000	CA-613	10/2022 –	1.6, 3.4,	Direct Member

Case Management Support and Landlord Engagement	CA-613 meeting on September 19, the CoC shared that landlords are not likely to rent available units to individuals deemed “high-risk” despite having an Emergency Housing Voucher. The Imperial Valley Housing Authority has released almost all available vouchers.	CA-613 IVCCC and/or community partners with case management and landlord advocacy activities to open up housing slots to those most vulnerable.		Imperial Valley Continuum of Care Council (IVCCC) and/or housing service providers	12/2023	3.5, 3.6	Interventions
5. Supporting Street Medicine Capacity Building	During a MCP and CA-613 meeting on August 15, the CoC shared that the county has limited street medicine services, and that additional infrastructure (i.e., staffing, technology) support is needed to enhance unsheltered member connections in Imperial County.	Funds will support housing service providers with needed infrastructure support to expand outreach to unsheltered people in Imperial County.	\$50,000	Street medicine providers	10/2022 – 12/2023	1.3, 1.6, 2.1, 3.1	Provider/ Partner Infrastructure
6. Developing a California Health & Wellness Social	California Health & Wellness needs to enhance its existing technical capabilities and processes to	California Health & Wellness is developing a Social Determinants of	\$123,686	California Health & Wellness	10/2022 – 12/2023	1.2, 2.2, 2.3, 3.1, 3.3, 3.4	MCP Infrastructure

<p>Determinants of Health (SDoH) Platform</p>	<p>more optimally handle SDoH/HMIS workflow to be able to match our member information with HMIS client information and to receive timely alerts from their local HMIS when our member experiences a change in housing status.</p>	<p>Health (SDoH) Platform to ensure there is a unified, holistic, and scalable technology approach for enabling race, ethnicity, and language (REL), sexual orientation and gender identity, (SOGI) and housing and other SDoH data exchange and integration with various 3rd party vendors and community provider systems. This platform will include data exchange through SFTP/FHIR API with HMIS systems.</p>					
---	--	---	--	--	--	--	--

PART II: RISK ANALYSIS

Description of Anticipated Contingencies (500 - 1000 word limit)

I. What factors the MCP anticipates may arise that would make it challenging for the MCP to achieve its goals and the HHIP program goals:

Through the DHCS Housing and Homelessness Incentive Program (HHIP), California Health & Wellness is committed to collaborating with the Imperial Valley Continuum of Care Council (IVCCC) and our Plan Partner in Imperial County to make investments that enhance Medi-Cal Managed Care Plan (MCP) capacity and partnerships to connect members to needed housing services and ultimately reduce and prevent homelessness.

Factors that may arise that may impact California Health & Wellness's ability to achieve our goals and HHIP program goals include, but are not limited to, the following:

- Whether California Health & Wellness, local providers, and community partners can quickly build and maintain the operational processes and data connections between MCPs and the homeless system to connect members to needed housing services and, ultimately, permanent housing. This will ultimately determine if MCPs can meet HHIP program measure requirements and thereby draw down HHIP funds to invest in the local communities we serve.
- The time needed to educate providers on HHIP. Throughout the development of the County Local Homelessness Plan that was submitted on June 30, 2022 and this Investment Plan deliverable, there has been a learning curve for all stakeholders to understand Medi-Cal managed care, the local housing system, and how the two will be connected through CalAIM and HHIP. We expect this collective learning and development to continue throughout the HHIP program period, which may impact the progress of HHIP strategies.
- Staffing capacity and infrastructure of our local level partners. The CoC and community partners have resource constraints that may impact their ability to engage with MCPs on HHIP. Staff turnover, competing priorities, budget limitations or freezes, and other operational changes (i.e., human resources, information technology, legal) that are experienced by our local level partners may impact the MCP's ability to demonstrate the required measure performance necessary to draw down the full HHIP allocation.

II. Which aspects of the IP might be affected by those factors:

We are making investments to help our internal data systems and the local HMIS achieve two-way data connectivity. IVCCC

currently subcontracts with the San Diego Regional Task Force for Homelessness (RTFH) for HMIS capabilities. Both IVCCC and RTFH have identified that their current HMIS capabilities do not support timely alerts, which is a HHIP S2 measure requirement; however, as of this September 30 submission, we have not been able to identify whether the HMIS platform vendor will be able to make technological changes necessary to comply with these HHIP requirement, and how much the platform update will cost. Beyond the MCP and CoC staff being able to upgrade both platforms to support HHIP program goals, we will also need to stand up processes between all entities that ensure data confidentiality and compliance with both Health Insurance Portability and Accountability Act (HIPAA) and Health Information Technology for Economic and Clinical Health Act (HITECH). This may impact all three steps related to the timely transit of information – 1) Securely move the data between entities, 2) validating data quality, and 3) developing the ability to bucket the data within the MCP – and may require the development of new risk mitigation strategies, and corresponding trainings, to ensure that all MCPs, providers, and partners input accurate local housing data and maintain a secure and effective data exchange.

Our ability to ultimately house our members and meet HHIP Priority Area 3 measures through investments in Case Management and Landlord Engagement Support may be impacted by our ability to make the systemic changes necessary during the HHIP program period to unlock current housing units and/or expand housing supply. For example:

- The CoC and community partners have shared concerns about landlord hesitancy to open units to those most vulnerable. Shifting the perceptions that landlords have about the ability of our members experiencing homelessness to maintain stable housing will require significant relationship building and time between community housing providers (i.e., housing navigators), landlords, and the MCPs.
- As noted through the 2022 PIT Count and our ongoing conversations with the CoC, the County is experiencing a shortage in housing supply. There is a risk that newly available units through our HHIP investments may not be given to our members, but rather, to those on the By Name List who are determined to be more vulnerable through the prioritization criteria.

III. What steps the MCP would take to address these factors and avoid or mitigate impact to the IP.

To address these potential risks and avoid or mitigate their impact on the Investment Plan, steps that California Health & Wellness will take include, but are not limited to, the following:

- Establish and maintain ongoing communication channels between all MCPs and the CoC to track the status on HHIP investments, identify operational risks, and troubleshoot problems that arise. As part of the County Local Homelessness Plan submitted on June 30, 2022, all MCPs and the CoC agreed to recurring meetings to discuss HHIP implementation. HHIP investments will be discussed in these forums.
- Develop guardrails that promote accountability and minimize fraud, waste, and abuse, including ensuring that the financial agreements between California Health & Wellness and entities receiving HHIP disbursements include provisions with specific fund use cases and clear processes for MCP reimbursement should funds be not used properly.
- Related to our internal technology investments, we will be intentional in applying focused resources and working in

collaboration with our CoC partners to achieve results in a secure and timely matter. Additionally, California Health & Wellness will leverage the expertise of our parent company, Centene Corporation, to launch these capabilities.

- Continue to educate the CoC and community partners about CalAIM, its housing-related service offerings, and associated funding opportunities to support infrastructure development and capacity-building. Our community partners are implementing a variety of local and innovative solutions to tackle the housing crisis and are still learning about CalAIM, Medi-Cal managed care, and the housing-related service offerings. To support CalAIM implementation and ensure non-duplication of funding, we are committed to educating stakeholders about the various funding opportunities offered through CalAIM (i.e., HHIP, CalAIM Incentive Payment Program, Providing Access and Transforming Health (PATH) Capacity and Infrastructure Transition, Expansion and Development (CITED) initiative, etc.)
- Finally, California Health & Wellness is committed to assessing the lessons learned from the development and implementation of the Investment Plan and we look forward to sharing these learnings as part of the Submission 1 and Submission 2 deliverables. Through continuous improvement and working closely with the CoC and community partners, we can ensure that investments address the HHIP program goals to build MCP capacity to connect members to services and ultimately reduce and prevent homelessness.

PART III: CoC LETTER OF SUPPORT

Please find attached the Imperial Valley Continuum of Care Council's (IVCCC) Letter of Support in the Investment Plan Appendix.

PART IV: Attestation

Please find attached California Health & Wellness's MCP Attestation in the Investment Plan Appendix.



**IMPERIAL VALLEY
CONTINUUM OF CARE COUNCIL
EXECUTIVE BOARD**



September 8, 2022

California Department of Health Care Services
1501 Capitol Avenue, MS 4000
P.O. Box 997413
Sacramento, CA 95899-7413

Re: Housing and Homelessness Incentive Program (HHIP) Investment Plan Letter of Support

The Imperial Valley Continuum of Care Council (IVCCC) is the coordinating body of the Imperial County's Continuum of Care, and includes all of the geography within the County of Imperial. The IVCCC is strategically comprised of an Executive Board that represents an array of stakeholders that enhance the capacity to coordinate and leverage resources from various community sectors throughout the County of Imperial. The Executive Board is responsible for building community awareness, regional planning, authorizing grant applications, setting regional goals and priorities for ending homelessness, monitoring performance targets, metrics and community process towards ending homelessness in the region.

The IVCCC is supportive of the California Department of Health Care Services (DHCS) Housing and Homelessness Incentive Program (HHIP) Investment Plans (IP) being submitted by California Health & Wellness and Molina in Imperial County. The IVCCC had the opportunity to engage and collaborate with California Health & Wellness and Molina, provide input on the IP, and were able to review the IP prior to the Medi-Cal managed care plan (MCP) submission. The IVCCC understands that the IP reflects a non-binding general direction for investments the MCPs are willing to initially make to meet DHCS' HHIP program metrics independent of how the MCPs plan to invest HHIP incentive funds once earned. The IVCCC also understands that the MCPs' HHIP investments are contingent on the MCPs meeting HHIP measures over the two-year HHIP program. To this end, the IVCCC is committed to collaborating with the MCPs as they engage locally to meet HHIP program metrics.

Sincerely,

A black rectangular redaction box covering the signature of Les Smith.

Les Smith – Executive Board Chairman
Imperial Valley Continuum of Care Council

**Medi-Cal Managed Care
Housing and Homelessness Incentive Program (HHIP) Investment Plan (IP)
Certification (to be completed by Health Plan CEO/CFO/COO/Authorized Executive)**

Health Plan: California Health & Wellness

County: Imperial

I certify that, to the best of my knowledge, the IP provides a true representation of the MCP's expected investment plan and strategy for achieving program measures and targets.

As a CEO, CFO, COO, or Executive duly authorized to sign on behalf of the Health Plan listed above, I am authorized or designated to make this Certification, and declare that I understand that the making of false statements or the filing of a false or fraudulent claim is punishable under state and federal law.

By: Martha Santana-Chin
Print name

September 29, 2022
Date


Signature

Medi-Cal President
Title