

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #12,
Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the
“Application for Hardship Waiver,” DHCS 6195 (Working Draft)
2/12/15

Comment

12.A. Comment of Support.

Thank you for the opportunity to comment on the proposed changes to the Application for Hardship Waiver. As you know, we are pleased that the Department is revising this form, as it will save a lot of confusion for applicants and no doubt save time for your staff.

Response

12.A. The Department appreciates this comment of support.

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02/12/2015

Comment

12.B. Suggested Edits

We do have a number of suggested edits to the form that we think will make it easier for consumers to understand and subsequently enable Recovery Program staff to process these applications more easily.

Response

12.B. The Department has proposed amendments to the form in response to comment. Please see Responses 12.E.-12.S.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #12,

Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)
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Comment12.C. Estate Recovery Questionnaire

In addition to the individual comments, we suggest that the DHCS website for “Estate Recovery Online Forms” be edited as it is misleading. A “Notice of Death” as required under PC 215 is simply that – a copy of the death certificate – not the questionnaire that the website states is a “Notice of Death.”

We ask that you change this to reflect the requirements under law or in the alternative to reflect what it is – a recovery questionnaire.

Response

12.C. This comment is outside the scope of this regulatory action.

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2/12/15

Comment12.D. Comment of Support

Again, I thank you for the opportunity to comment on the hardship application. Changes are long overdue and we appreciate your willingness to revise the form.

Response

12.D. The Department appreciates this comment of support.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #12,

Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment12.E. Additional Languages

Page 1, First Paragraph: Add instructions in Chinese and Spanish for applicant to request the hardship form in another language. Forms in different languages should also be available online.

Response

12.E. Past language studies conducted by the Third Party Liability and Recovery Program have not shown a “substantial number” (five percent or more) of individuals with Limited English Proficiency.

In consideration of this comment and upon further review, the Application for Hardship Waiver, DHCS 6195 (05/15), was amended through a 15-Day Public Availability, published on July 15, 2015. The Department proposes to make the form available in a Spanish version. The English version of this form is proposed to include instructions in Spanish, with an option to request a Spanish version of the form. The form will be available online or the form can be requested by mail from the Department. The Department will continue to assess the need to provide forms in additional languages. As an alternative, the Department may provide assistance to complete the English version of the form. In addition, an individual may contact the case representative to discuss translation services to assist the individual in completing the form.

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Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment

12.F. Predeceased Spouse

Page 1, Section A: “Predeceased Spouse’s Name (if applicable).”

Add to: “Predeceased Spouse’s Name *(if pre-deceased spouse was on Medi-Cal)*.”

Comment: Most applicant’s don’t know what “if applicable” means

Response

12.F. In consideration of this comment and upon further review, Section A of the Application for Hardship Waiver, DHCS 6195 (05/15), was amended through a 15-Day Public Availability, published on July 15, 2015, to read: “Did the decedent have a spouse or registered domestic partner who died before the decedent and who was also on Medi-Cal? Yes/No. If yes, please provide: Predeceased Spouse/Registered Domestic Partner’s Name and DHCS Account Number.”

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2/12/15

Comment

12.G. DHCS Account Number

Page 1, Section A: “DHCS Account Number.”

Add to: “DHCS Account Number *(if pre-deceased spouse was on Medi-Cal)*.”

Comment: Most applicants don’t know what this means

Response

12.G. Please see Response 12.F.

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Comment12.H. Other Assets**Page 1, Section A, bottom of page:** “Other Assets”Change to: “Other Assets *in Decedent’s name at the time of death.*”**Comment:** Many applicants think you are asking for their own information, and this would clarify the question.**Response**

12.H. In consideration of this comment and upon further review, Section A of the Application for Hardship Waiver, DHCS 6195 (05/15), was amended through a 15-Day Public Availability, published on July 15, 2015, to read “Other Assets in the decedent’s name at the time of death.”

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COMMENT LETTER #12,

Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)
2/12/15

Comment12.I. Stocks/Bonds**Page 2, Section A:** “Stocks/Bonds/Notes/Other Known Estate Property”Change to: “Stocks/Bonds/Notes/Other Known Estate Property *in the Decedent’s name at the time of death.*”**Comment:** See above

Response

12.I. In consideration of this comment and upon further review, Section A of the Application for Hardship Waiver, DHCS 6195 (05/15), was amended partially based on this comment, through a 15-Day Public Availability, published on July 15, 2015, to read “Stocks/Bonds/Notes/Other Personal Property (automobiles, etc.) in the decedent’s name at the time of death.”

Other personal property (automobiles, etc.) was included for purposes of clarity.

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COMMENT LETTER #12,

Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment

12.J. Jewelry/Antiques

Page 2, Section A: Delete “Jewelry, Antiques.”

Comment: What is the Department’s process for valuing and collecting such assets? If there is none, applicant should not have to list these assets. Again, this is confusing to most applicants, they don’t know whether something is an antique or not or even what it is worth. Why include such information in the first place?

Response

12.J. In response to this comment, jewelry and antiques are not included. Personal property is covered under “other personal property,” Section A.

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COMMENT LETTER #12,

Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment12.K. Out-of-pocket administration expenses

Page 2, Section A: “out-of-pocket administration expenses.”

Change to: “out-of-pocket administration expenses, such as *mortgage payments, probate attorney fees, taxes, insurance, etc.*” Also add, “*Please list expenses and provide copies of receipts.*”

Comment: There is a lot of confusion about what out-of-pocket administration expenses include, and providing examples and asking for a list of expenses would assist the applicants and the Recovery staff.

Response

12.K. In consideration of this comment and upon further review, Section A of the Application for Hardship Waiver, DHCS 6195 (05/15), was amended through a 15-Day Public Availability, published on July 15, 2015, to read “...out-of-pocket administration expenses, such as mortgage payments, attorney fees, taxes, insurance, etc.). Please list expenses and provide copies of receipts or statements.” A listing to include the “Type of Expense and Amount” follows, for convenience.

The term “statements” was included in addition to “receipts” for purposes of clarity.

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Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment12.L. Criteria

Page 2, Section C, Instructions: “Check the criteria below.”

Change to: “Check *all applicable* criteria below.”

Comment: There may be multiple hardship criteria that apply.

Response

12.L. In consideration of this comment and upon further review, Section C of the Application for Hardship Waiver, DHCS 6195 (05/15) was amended through a 15-Day Public Availability, published on July 15, 2015, to read “Check all applicable criteria below....”

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #12,

Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (05/15) (Working Draft)
2/12/15

Comment

12.M. Social Services Worker Letter

Page 2, Section C, Criterion # 1: “Please submit a letter from your county social services worker.” This requirement should be deleted.

Comment: It will be nearly impossible for the applicant to obtain such a letter, since many beneficiaries of benefits and/or Medi-Cal don’t even have a “social services worker” much less one who would calculate what impact receipt of an inheritance would have on benefits. Nor is there anything in the regulations that substantiates this request. It should be sufficient for the applicant to submit proof of eligibility for benefits received.

Response

12.M. In consideration of this comment and upon further review, Section C, Criterion #1 of the Application for Hardship Waiver, DHCS 6195 (05/15), was amended partially based on this comment, through a 15-Day Public Availability, published on July 15, 2015. The Department receives letters from social services workers describing an applicant’s likelihood of discontinuing benefits. However, Section C, Criterion #1. of this form was amended to read, “A letter from the applicant’s county social services worker...,” **or** “Proof of eligibility for benefits received by the applicant, **and** Proof that the inheritance would discontinue the benefits received by the applicant.”

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #12,

Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)
2/12/15

Comment12.N. Financial Institution

Page 2, Section C, Criterion 3: “from a financial institution as defined in Probate Code Section 40.” Change to: “from a financial institution (e.g. bank, savings and loan, credit union, etc.)”

Comment: It can be assumed that most applicants are not familiar with Probate Code Section 40 and do not know how a “financial institution” is defined. It would be helpful to provide examples.

Response

12.N. In consideration of this comment and upon further review, Section C, Criterion #3 of the Application for Hardship Waiver, DHCS 6195 (05/15), was amended partially based on this comment, through a 15-Day Public Availability, published on July 15, 2015. While the language for Criterion #3 was not changed, the documentation request was amended to read, “A denial letter from a financial institution (a bank, savings and loan, credit union, etc.)...,” as further clarification of a qualified financial institution.

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COMMENT LETTER #12,

Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment12.O. Proof, Examples

Page 2, Section C, Criterion 3 – Proof: This section should be changed to read:

Please submit proof that the applicant is aged (65 years or older), blind or disabled within the meaning of Section 1614 of the Federal Social Security Act (42 USW Section 1382c), e.g., SSI or SSDI award letter, proof that the applicant lived in the decedent’s home for at least one year prior to the decedents death (e.g. utility bills, bank statements in applicant’s name) and a letter from a financial institution (e.g. a bank, savings and loan, credit union, etc.), for your share of the claim or your share of the estate, whichever is less.

Comment: For this form to be truly helpful, it is essential that examples of the type of proof desired or required be included.

Response

12.O. In consideration of this comment and upon further review, Section C, Criterion #3 of the Application for Hardship Waiver, DHCS 6195 (05/15), was amended partially based on this comment, through a 15-Day Public Availability, published on July 15, 2015, to read, “Proof that the applicant is aged (65 years or older), blind, or disabled within the meaning of Section 1614 of the Federal Social Security Act (42 USC Section 1382c); documentation may include a Supplemental Security Income or Social Security Disability Insurance award letter, etc.” Examples of proof of the applicant’s residency are also requested as the section now reads “...documentation may include a utility bill, bank statement in applicant’s name, etc., **and** Proof that the applicant continues to reside in the decedent’s home; documentation may include a utility bill, bank statement in the applicant’s name, etc.; **and** a denial letter from a financial institution...”. Proof of previous and current residence in the decedent’s home is needed to substantiate the hardship waiver criteria. Financial institution is further clarified as “a bank, savings and loan, credit union, etc.”

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #12,

Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment12.P. Proof, Examples, Residency

Page 3, Section C, Criterion 4: “proof that the applicant resided in the decedent’s home” Change to, “proof that the applicant resided in the decedent’s home (*e.g. utility bills, bank statements in applicant’s name*)”

Comment: See #11 – again examples of the type of proof needed is more than useful.

Response

12.P. Please see response 12.O.

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COMMENT LETTER #12,

Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment12.Q. Separation of Section

Page 3, Section C, Criterion 6. The proof required of the applicant should be divided into two sections:

- 6a) proof that equity is needed to keep property habitable
- 6b) proof that equity is needed acquire the necessities of life.

Comment: If the applicant is claiming 6(a), they should not be required to provide financial information required for 6(b).

Response

12.Q. In consideration of this comment and upon further review, Section C, Criterion #6. of the Application for Hardship Waiver, DHCS 6195 (05/15), was amended through a 15-Day Public Availability, published on July 15, 2015. Criterion #6 was split to include Sections 6A – “The equity in the real property is needed by the applicant to make the property habitable”; and 6B – “The equity in the real property is needed to acquire the necessities of life, such as food, clothing, shelter or medical care.” The applicant in 6A is instructed to skip Sections D, E and F.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #12,

Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment12.R. Duplication Deletion

Page 3, Section D: Delete repeated phrase: “two most recent pay stubs for each member of the household.”

Response

12.R. In consideration of this comment and upon further review, Section D of the Application for Hardship Waiver, DHCS 6195 (05/15), was amended through a 15-Day Public Availability, published on July 15, 2015. The duplicated language, as specified, was deleted.

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COMMENT LETTER #12,

Patricia McGinnis, Executive Director on behalf of California Advocates for Nursing Home Reform (CANHR) in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment12.S. Chart Line Change**Page 6, Section F:** Bottom line of chart should read, “**TOTAL ASSETS.**”**Response**

12.S. In consideration of this comment and upon further review, Section F of the Application for Hardship Waiver, DHCS 6195 (05/15), was amended through a 15-Day Public Availability, published on July 15, 2015. “TOTAL ASSETS” was added at the bottom of the section to include the total sum of applicant’s assets.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #13,

Georgia Burke and Amber Cutler, Attorneys on behalf of National Senior Citizens Law Center in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment13.A. Comment of Support

We recognize the difficulty in creating a form to address all the requirements of the estate recovery statute and appreciate the efforts of the Department to make the form easier for consumers to use.

Response

13.A. The Department appreciates this comment of support.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #13,

Georgia Burke and Amber Cutler, Attorneys on behalf of National Senior Citizens Law Center in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment13.B. Comment of Support and Edits

The draft form is an improvement, and we have some additional suggestions to make it easier to navigate.

Response

13.B. The Department appreciates this comment of support. Please see Responses 13.C.-13.K.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #13,

Georgia Burke and Amber Cutler, Attorneys on behalf of National Senior Citizens Law Center in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment13.C. Agreement with CANHR

We have reviewed the thorough comments of California Advocates for Nursing Home reform (CANHR) and fully endorse all the changes suggested by CANHR. Below we have provided some additional comments.

Response

13.C. The Department acknowledges the support for the comments presented by CANHR. The Department’s responses to the comments presented by Patricia McGinnis of CANHR are provided in Responses 12.A.–12.S.

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COMMENT LETTER #13,

Georgia Burke and Amber Cutler, Attorneys on behalf of National Senior Citizens Law Center in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment13.D. Contact Address for Applicant

We suggest that the form include a telephone number and/or email address for applicants to use if they have questions about the form. We also suggest that the mailing address for submission be included on the form. We recognize that there is a cover letter accompanying the form but that may get separated from the form, so we suggest putting the information directly on the form as well.

Response

13.D. In consideration of this comment and upon further review, the Application for Hardship Waiver, DHCS 6195 (05/15), was amended through a 15-Day Public Availability, published on July 15, 2015, to include both the mailing address and contact phone number on the first page.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #13,

Georgia Burke and Amber Cutler, Attorneys on behalf of National Senior Citizens Law Center in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

02/12/2015

Comment13.E. Instruction Sheet:

Because the form covers several bases for exemption and asks for detailed information, it would be helpful if the instructions throughout were more specific and detailed, particularly emphasizing what is not required if the request is based on a particular exemption category. To allow room for fuller explanations, we ask that you consider adding an accompanying instruction sheet so that the applicant can be walked through the process more fully.

Response

13.E. In consideration of this comment and upon further review, the Application for Hardship Waiver, DHCS 6195 (05/15), was amended partially based on this comment through a 15-Day Public Availability, published on July 15, 2015. Comments/instructions have been added throughout the form to specify what information is necessary and under what circumstances; see responses 13.H. and 13.I. The Department will continue to monitor consumer feedback and assess the need for a specific instruction sheet.

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COMMENT LETTER #13,

Georgia Burke and Amber Cutler, Attorneys on behalf of National Senior Citizens Law Center in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment

13.F. Translation:

We ask for the translation on the form and instructions into the threshold languages. In the short term, we share the request of CANHR for Chinese and Spanish statements about the availability of the forms in those languages.

Response

13.F. Please see Response 12.E.

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COMMENT LETTER #13,

Georgia Burke and Amber Cutler, Attorneys on behalf of National Senior Citizens Law Center in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment

13.G. Format:

Our major concern with the form is that consumers, particularly those with low literacy, may think they need to complete more sections than are necessary and, based on that perception, may be discouraged from applying for an exemption or may miss the deadline. We

ask that you consider formatting the form to emphasize that the “please submit” information is related only to the particular exemption item. Perhaps indenting the “please submit” paragraph would help.

Response

13.G. In consideration of this comment and upon further review, the Application for Hardship Waiver, DHCS 6195 (05/15), was amended through a 15-Day Public Availability, published on July 15, 2015. The “Please submit” header was indented for clarity. In addition, another header – “Please complete” – was added to inform the applicant what additional sections of the form must be completed and to clearly distinguish what section(s) are not required to be completed.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #13,

Georgia Burke and Amber Cutler, Attorneys on behalf of National Senior Citizens Law Center in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment**13.H Unnecessary Sections**

We are concerned particularly that individuals will believe they need to complete sections, D, E and F when that is not necessary. We suggest, in Section C, for each exemption a change along the following lines:

Information required for Exemption 1: Please submit... If Exemption 1 is the only basis for your request, you can skip Section D, E and F. Go straight to Section G.

Information required for Exemption 2: Please complete Section D “Applicant’s monthly income” on page three. If Exemption 2 is the only basis for your request, you can skip Sections E and F.

Response

13.H. In consideration of this comment and upon further review, the Application for Hardship Waiver, DHCS 6195 (05/15), was amended through a 15-Day Public Availability, published on July 15, 2015. Changes are made under each Criteria (1-6) for further instruction to either “complete” or “skip” Sections D, E and F.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #13,

Georgia Burke and Amber Cutler, Attorneys on behalf of National Senior Citizens Law Center in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment13.I. Sections D, E and F

We also suggest the following changes for Section D, E and F:

For Section D, add “You can skip this section is you are only applying based on criteria 1, 3, 4 or 5.”

For Section E, add, “You can skip this section is you are only applying based on criteria 1, 2, 3, 4 or 5.

For Section F, add, You can skip is you are only applying based on criteria 1, 2, 3, 4 or 5.

Response

13.I. In consideration of this comment and upon further review, the Application for Hardship Waiver, DHCS 6195 (05/15), was amended through a 15-Day Public Availability, published on July 15, 2015. The headers under Sections D, E and F are amended to specify that if an applicant is applying based on specific criteria under Section C (1. - 6.A), it is not necessary to fill out the Section.

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COMMENT LETTER #13,

Georgia Burke and Amber Cutler, Attorneys on behalf of National Senior Citizens Law Center in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment13.J. Consumer Testing

We also suggest some consumer testing of the form, either through a focus group or even more informal means. We have seen repeatedly – most recently with notices prepared by DHCS in connection with the Coordinated Care Initiative – that there is no substitute for hearing directly from consumers about how they interpret a form or communication. This is particularly important where, as here, the individual trying to navigate the form are usually low income and often have low literacy and/or low financial literacy.

Response

13.J. The Department does not plan on pursuing consumer testing at this time. However, a case representative is available to assist consumers with any questions regarding the use of the form and estate recovery. The Department will continue to monitor consumer feedback of the form and revisions will be made as necessary.

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COMMENT LETTER #13,

Georgia Burke and Amber Cutler, Attorneys on behalf of National Senior Citizens Law Center in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/12/15

Comment

13.K. Comment of Support

Thank you for the opportunity to comment on the hardship waiver application.

Response

13.K. The Department appreciates this comment of support.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #14,

Linda Nguy, Legislative Advocate on Behalf of Western Center of Law & Poverty in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/13/15

Comment

14.A. Comment of Support

Western Center on Law & Poverty thanks you for the opportunity to comment on the proposed changes to the Application for Hardship Waiver (DHCS 6195). Recognizing the difficulty in creating a form that addresses all the requirements of the estate recovery statute, we appreciate the Department’s effort to make the form easier for consumers to complete.

Response

14.A. The Department appreciates this comment of support.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #14,

Linda Nguy, Legislative Advocate on Behalf of Western Center of Law & Poverty in response to the “Application for Hardship Waiver,”
DHCS 6195 (Working Draft)

2/13/15

Comment

14.B.-14.F. Comments 14.B.-14.F. submitted in Comment Letter #14 are identical to those submitted in Comment Letter #13.

Response

14.B.-14.F. Please see Responses 13.D.-13.G. and 13.J.

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COMMENT LETTER #14,

Linda Nguy, Legislative Advocate on Behalf of

Western Center of Law & Poverty in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/13/15

Comment

14.G.-14.U. Comments 14.G.-14.U submitted in Comment Letter #14 are identical to those submitted in Comment Letter #12.

Response

14.G.-14.U. Please see Responses 12.E.-12.S.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #14,

Linda Nguy, Legislative Advocate on Behalf of

Western Center of Law & Poverty in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/13/15

Comment

14.V. Comment 14.V. is identical to Comment 12.C. in Comment Letter #12.

Response

14.V. Please see Response 12.C.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #15,

Claire M. Ramsey, Staff Attorney on Behalf of Legal Aid Society of San Mateo County in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/13/15

Comment

15.A. Comment of Support

Thank you for the opportunity to comment on the proposed changes to the Application for Hardship Waiver.

Response

15.A. The Department appreciates this comment of support.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #15,

Claire M. Ramsey, Staff Attorney on Behalf of Legal Aid Society of San Mateo County in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/13/15

Comment

15.B. Agreement with CANHR

The Legal Aid Society is writing in support of suggested edits submitted by CANHR. We believe the draft hardship waiver application is a big step in the right direction, but believe that with CANHR’s additional edits it will be more user-friendly and understandable for the average consumer. I have included CANHR’s proposed changed below.

Response

15.B. The Department acknowledges the support for the comments presented by CANHR. The Department’s responses to the comments presented by Patricia McGinnis of CANHR are available in Responses 12.A. – 12.S.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #15,

Claire M. Ramsey, Staff Attorney on Behalf of Legal Aid Society of San Mateo County in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/13/15

Comment

15.C. Comment 15.C. is identical to Comment 12.C. in Comment Letter #12.

Response

15.C. Please see Response 12.C.

Commenter Name, Title, Organization and Date Comment Received

COMMENT LETTER #15,

Claire M. Ramsey, Staff Attorney on Behalf of Legal Aid Society of San Mateo County in response to the “Application for Hardship Waiver,” DHCS 6195 (Working Draft)

2/13/15

Comment

15.D.-15.R. Comments 15.D.-15.R. in Comment Letter #14 are identical to Comments 12.E.-12.S. in Comment Letter #12.

Response

15.D.-15.R. Please see Responses 12.E.-12.S.