

December 9, 2020

Will Lightbourne, Director  
Department of Health Care Services  
MS 0000  
PO Box 997413,  
Sacramento, CA 95899-7413

RE: Continuation of Existing Waivers and Flexibilities

Dear Director Lightbourne,

The Medi-Cal Children's Health Advisory Panel (MCHAP) is an independent, statewide advisory board that is pleased to advise the California Department of Health Care Services on matters relevant to all children enrolled in Medi-Cal.

Due to the COVID-19 public health emergency (PHE), children and families have been less likely to visit a doctor or county Medi-Cal office, and as a result less likely to enroll in Medi-Cal. In fact, even before the pandemic began, California saw a drop in the number of children enrolled in Medi-Cal. According to our Medi-Cal Children's Health Dashboard (September 2020), at the end of Quarter 1 of 2017, there were 5.65 million children enrolled in Medi-Cal. That dropped to 5.17 million at the end of Quarter 1 of 2020. While some of that change was due to increased take-up in employer-based coverage, over the same time period, the estimated number of uninsured California children increased by 60,000.

Now, during the current PHE, states have experienced the highest increases in unemployment to the point that the California Employment Development Department had to temporarily halt new claims at the beginning of Quarter 4 of 2020. At the same time, according to the published report, "Medi-Cal Monthly Eligible Fast Facts, September 2020", Medi-Cal had its first increase in enrollment since Quarter 1 of 2016. It is important that we work as soon as possible on reversing the number of uninsured children while protecting existing enrollees. We must ensure that all eligible children are enrolled (and continue eligibility) in Medi-Cal while ensuring that upon the conclusion of our current PHE, the Department is able to function without interruption in enrollment activities.

Based on our board's experience under the former Managed Risk Medical Insurance Board during Quarter 3 of 2009, when enrollment was frozen, the long-term effects of interruptions in coverage options would be devastating to the children of California. It is critically important that the state work to ensure all necessary systems and resources are in place to avoid any service interruptions, either through enrollment or continuation of coverage, for children and their families.

Therefore, we urge you to work with Mr. Alex M. Azar II, U.S. Secretary of Health and Human Services, in ensuring that ALL existing and new waivers and flexibilities granted during the current PHE are extended once the PHE ends. Specifically, we see the need

to continue waivers related to enrollment, coverage exemptions, telehealth, and share of cost that were granted during the PHE, pursuant to Mr. Azar's authority, under section 319 of the Public Health Service Act, on January 27, 2020, and renewed in subsequent orders. We recommend the continuation of existing and new waivers and flexibilities beyond the conclusion of the currently PHE for at least six (6) months, or for a period of time equal to half the number of days of the current emergency, whichever is greater.

MCHAP members believe this period of time, in addition to advance notification related to the conclusion of the PHE, is necessary to help ensure the Department has adequate time to communicate with beneficiaries while processing backlogs created during the emergency. Most importantly, the state must ensure the continuity of coverage for beneficiaries when the Department begins the unprecedented effort of resolving backlogs, when the time warrants, in the coming months.

Sincerely,

Ken Hempstead, M.D.

Chair, Medi-Cal Children's Health Advisory Panel, on behalf of the Panel

CC: Alex M. Azar II, U.S. Department of Health & Human Services

AYES: Ken Hempstead, M.D., Pediatrician Representative; Jan Schumann, Subscriber Representative; William Arroyo, M.D., Mental Health Provider Representative; Katrina Eaglen, D.D.S., Licensed Practicing Dentist; Ellen Beck, M.D., Family Practice Physician Representative; Diana Vega, Parent Representative; Ron DiLuigi, Business Community Representative; Nancy Netherland, Parent Representative; Alison Beier, Parent Representative; Pamela Sakamoto, County Public Health Provider Representative; Elizabeth Stanley Salazar, Substance Abuse Provider Representative; Karen Lauterbach, Non-Profit Clinic Representative; Terrie Stanley, Health Plan Representative; Michael Weiss, M.D., Licensed Disproportionate Share Hospital Representative; Jovan Salama Jacobs, Ed.D., Education Representative. (15)

NOES: None (0)

ABSTAIN: None (0)

ABSENT: None (0)