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March 22, 2019

Sarah Brooks
Deputy Director, Health Care Delivery Systems
Department of Health Care Services
1501 Capitol Avenue
Sacramento, CA 95814

Via e-mail: DHCS_PMMB@dhcs.ca.gov

Re: Governor's 2019-20 Budget -- Propositions 56 Proposals

Dear Sarah:

Local Health Plans of California ("LHPC") is a statewide trade association representing all 16 of California's not-for-profit and community-based health plans, which collectively cover 70% of the state's 10.6 million Medi-Cal managed care beneficiaries. We would like to thank the Department of Health Care Services ("Department") for the opportunity to provide input on the Proposition 56 proposals included in the Governor's 2019-20 Budget. In addition to the enclosed letter, we have attached the Department's comment grid with specific remarks and recommendations on each of the proposed measures for the proposed Value-Based Payment ("VBP") Program.

General Comments

- *Plan involvement in developing payment methodologies.* LHPC requests further discussion with the Department to develop a payment methodology for each program. Particularly given the number and complexity of the measures eligible for incentive payments in the VBP Program, ensuring equitable risk will require careful analysis.
- *Expand eligible provider types.* For each proposal, LHPC recommends including mid-level providers as eligible providers so long as service associated with measure is within the provider's scope of practice. This could include nurse practitioners, physician assistants, and behavioral health providers. The incentive payment could go to the supervising physician.

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VBP Program

- *Refine the measures.* There are many clinical and operational questions and considerations that accompany each of the proposed measures. LHPC requests that DHCS engage local plan Chief Medical Officers to further refine the measures and discuss the feasibility of each measure.
- *Align with national measures.* To the extent DHCS is proposing measures similar to existing HEDIS or CMS Child or Adult Core Set measures, LHPC recommends alignment of the VBP Program measures with the respective national measure.
- *Include FQHCs and RHCs.* Community clinics provide care to over 4 million Medi-Cal beneficiaries and are a critical part of the Medi-Cal delivery system. Therefore, LHPC recommends the Department include these entities for participation in the VBP Program.
- *Specifications needed.* For all measures, LHPC requests additional details on the specifications, including codes and criteria to identify the service, and any limitations on the service (e.g., annual frequency).

Trauma Screenings

Local plans recognize the negative impact trauma has on health outcomes and look forward to working with the Department implement supplemental payments to incentive trauma screenings of child and adult beneficiaries.

- *Allow evidence-based screening tools.* We recommend the Department allow plans to use any evidence-based screening tool for children rather than requiring the use of a specific tool.
- *Identify resources for provider training and behavioral health services.* LHPC recommends the Department identify resources for provider training and develop strategies for increasing access to behavioral health services as a part of this proposal. We believe these are critical to ensuring that screening is done effectively and that subsequent treatment needs can be addressed.

Thank you again for the opportunity to comment, and we look forward to partnering with the Department to further develop the Proposition 56 budget proposals. Please do not hesitate to contact me at koopmans@lhpc.org with any questions.

Sincerely,

Linnea Koopmans, Director of Government Affairs