



August 8, 2017

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Department of Health Care Services  
Sacramento, California

Delivered via email: [advisorygroup@dhcs.ca.gov](mailto:advisorygroup@dhcs.ca.gov)

Re: Draft All Plan Letter Long-Term Care Coordination and Disenrollment

Greetings:

Thank you for the opportunity to comment on the All Plan Letter (APL) on Long-Term Care Coordination and Disenrollment. We are pleased to see the Department update this APL to include care coordination responsibilities for plans during the period members remain enrolled while receiving care in a long-term care facility. We have two recommendations that we strongly urge the Department to include in the APL.

First, the APL as currently written encourages institutionalization by limiting plans' coordination responsibilities to facilitating placement in the facility. The APL must also direct plans to assess and facilitate the provision of home and community based services (HCBS) that would help a member return to the community including, but not limited to, assessment for In-Home Supportive Services (IHSS) and referrals to Community-Based Adult Services (CBAS) and the Multi-Purpose Senior Services Program (MSSP). The approximately one to two month period during which a Medi-Cal beneficiary in a facility remains a plan member is often a critical period for initiating HCBS to ensure that a return to the community occurs efficiently and without service gaps.

Second, the APL should make clear that the disenrollment guidance is inapplicable to plans in Coordinated Care Initiative (CCI) counties where members remain enrolled in the health plan following admission into a nursing facility.

Please feel free to contact us to discuss our recommendations further.

Sincerely,

Disability Rights Education & Defense Fund  
Health Consumer Alliance\*  
Justice in Aging

\*The Health Consumer Alliance (HCA) is a statewide collaborative of consumer assistance programs operated by community-based legal services organizations, which includes: Bay Area Legal Aid, California Rural Legal Assistance, Central California Legal Services, Greater Bakersfield Legal Assistance, Legal Aid Society of Orange County, Legal Aid Society of San Diego, Legal Aid Society of San Mateo, Legal Services of Northern California, Neighborhood Legal Services of Los Angeles County, the National Health Law Program, and the Western Center on Law and Poverty.