

# JUSTICE IN AGING

FIGHTING SENIOR POVERTY THROUGH LAW

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Re: Draft Dual Plan Letter on Care Plan Option Services

Greetings:

Thank you for the opportunity to comment on the draft Dual Plan Letter on Care Plan Option (CPO) services. We applaud the Department for providing clarifying language in the DPL on requirements for plans to maintain grievance and appeals processes that comply with California law and contract provisions. We have provided additional changes to the DPL through redline edits to the attached draft.

We continue to urge the Department to release data demonstrating the extent that plans are providing CPO services. At the outset of Cal MediConnect, the Department contended that adding home and community based services as a plan benefit was not necessary because health plans would be financially incentivized to provide these services to avoid costly hospitalizations or institutionalization. Yet, reports from beneficiaries and on-the-ground community based providers suggests that this has not been the case. One primary goal of the Cal MediConnect program is to rebalance the provision of services from institutional to home and community based settings. Without data around the provision of these services, the public has no means of assessing whether the program is meeting this goal.

Please feel free to contact us with any questions.

Sincerely,

Amber Christ  
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