



November 2, 2018

Ms. Jennifer Kent  
Director, Department of Health Care Services  
1500 Capitol Ave  
Sacramento, CA 95814

Re: Proposed State Plan Amendment 18-0055

Dear Director Kent:

Please accept Health Center Partners of Southern California's comments on the State Plan Amendment (SPA 18-0055) seeking to add clarification for services rendered outside of a clinic facility. First, we appreciate the considerable time DHCS has already spent communicating with our state primary care association, CPCA. Health center leaders from across the state have been engaging bi-weekly with CPCA to identify areas of agreement and compromise that will be suitable to both you as the "funder" of services and our health centers, "the providers." This level of dialogue is critical to ensure California's Medi-Cal beneficiaries have access to needed services, while allowing the state to be good stewards of the dollars. It is clear health center feedback has been heavily considered in the draft you have will soon present to CMS; and we offer our sincere appreciation for that partnership.

Health Center Partners of Southern California is a voluntary association of sixteen primary care providers serving San Diego, Riverside and Imperial Counties. In 2017, our members provided a range of medical, dental and behavioral health care to more than 900,000 Californians in over 2.68 million encounters. Sixty-four percent of these patients (550,885) were Medi-Cal beneficiaries. Since Medi-Cal represents such a large majority of the patients our members serve, we welcome this opportunity to provide comments about the upcoming State Plan Amendment. It is the desire of our members to be strong and collaborative partners with the Department of Health Care Services and the state of California, so we can continue to demonstrate effective leadership and innovative strategies to increase care to underserved residents.

#### Comments

The draft SPA 18-0055 is a considerable improvement over the original draft SPA we first saw early in 2018. This draft comes much further in understanding the critical and unique role health centers play in caring for California's most vulnerable people and affords our important delivery system mechanisms to ensure financial stability in our aims to deliver access to all who need it. We are particularly reassured to see the state acknowledges that homebound, homeless and migrant and seasonal farmworkers are challenged by their living and health circumstances and require additional support from Medi-Cal to ensure they stay as healthy as possible.



There remain areas of the SPA where we hope to see additional changes. These comments are provided to ensure continuity of care for current and future beneficiaries and to keep our collective focus on improving the overall health of individuals in our communities.

#### DENTAL CARE

Knowing the significant need for oral health services, several years ago, our member agencies instituted an innovative approach to increasing access to oral health for children in poor communities. The "Portable Dentistry" project allows licensed dental health center providers the opportunity to partner with schools in disadvantaged communities and take the care where it is most needed. Unlike traveling mobile units, this program takes up very little space and can be done easily in new locations of need. As a voluntary program, the schools change from year to year, making it difficult for health centers to add the specific site as a service location. Under these new SPA rules, this program would no longer be reimbursable for health centers, and **thousands of children would lose access to this valuable service**. Similarly, several health centers in Southern California are performing Virtual Dentistry in which the client is established as a patient after the rendering of treatment through TeleHealth. In both instances, the proposed changes in the SPA would negatively impact the children receiving care. **Please consider expanding your definition of established patient to include these types of innovative approaches to care for vulnerable communities.**

#### INPATIENT CARE - Newborns

Our member health centers deliver thousands of babies each year. In some of these instances, the mother has not received any prenatal care and does not have a provider of record. In other cases, the mother has received her prenatal care from one of our health center providers, but the BABY is not considered a patient with a medical record. **We encourage you to please include a provision where the newborn can be assigned to the delivering provider, if that provider accepts Medi-Cal.**

Again, we thank the Department for accepting this feedback. If we can provide you with any additional information, please don't hesitate to reach out to our Chief Experience Officer, Vernita Todd ([vtodd@hcpsocal.org](mailto:vtodd@hcpsocal.org)) or 619.542.4334.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Henry N. Tuttle".

Henry N. Tuttle  
President & CEO