



Director William Lightbourne
Department of Healthcare Services
P.O. Box 997413, MS 0000
Sacramento, CA 95899-7413

July 24, 2020

RE: Medi-Cal Renewal Waiver Request

Dear Director Lightbourne:

On behalf of our safety-net providers, consumer advocates and San Diego's Medi-Cal Beneficiaries, **we respectfully request the State implement a full waiver of all Medi-Cal Renewal during this period, not just a delay in renewals through [Executive Order N-71-20 \(EO\)](#)**. Further, we request that when the current EO ends, the renewal months for impacted beneficiaries be set to the next scheduled renewal, unless the Beneficiary requests or requires a re-determination.

Without a full Medi-Cal Renewal waiver, counties would be required to attempt to go back and process those currently suspended, causing significant confusion, an unsustainable workload burden on Counties, and eligible individuals to lose coverage. These losses will create more work with most eventually reinstated and there will be little to no fiscal benefit to the State. All of this at a time when the public health emergency continues, and people desperately need stable health care coverage!

In San Diego County there are now over 771,000 Medi-Cal beneficiaries with approximately 50,000 of these new since February. At the same time, County workers have processed 95,000 new CalFresh applications. San Diego County normally processes an average of 35,000 Medi-Cal renewals per month; workers cannot handle a doubling of that number.

Case Workload Burden on the County

- The workload involved in requiring Counties to go back and process double the number of renewals cannot be accomplished; it is an impossible expectation and beneficiaries will suffer.
- In the COVID-19 environment, any income information provided on renewals may have changed since submission; therefore, submitted renewals would need to be re-verified with Beneficiaries before any discontinuances could take place.
- Even if the County could double their workload without harm to beneficiaries, there is little to no fiscal benefit to going back to complete retroactive renewals. All discontinuances that might result from this effort would be prospective.

Renewal Packet Confusion

- Renewal packets have continued to be mailed to Beneficiaries despite the EO N-71-20 (which suspends renewals and discontinuances starting March 2020). So, Beneficiaries may or may not have returned renewal packets and any of the required documentation or verifications.



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- These renewals have not been processed because the County prioritized processing the increased number of new applicants for Medi-Cal (and other programs) per DHCS guidance.
- Further, it is unclear whether DHCS will require the County to return a case back to its original renewal month or change it to the month the renewal was processed creating an uneven workload across the year.
- For the Beneficiaries who did provide a renewal packet and documentation/verifications, this retroactive renewal processing would create a significant workload issue, making it unlikely the County could efficiently process these renewals. For example, the last time this happened (i.e. CalHEERS System) counties were not able to process cases effectively and eligible Beneficiaries lost coverage.
- The County will need to request information again from the Beneficiaries who did not provide their renewal packet and/or adequate documentation - potentially putting the Beneficiary within months of their next renewal. However, normal work practices would be to reset the renewal date to the month processed extending the workload issues into the future.

With record-high unemployment rates due to COVID-19, the demand for Medi-Cal coverage will never be higher. The needs of our patient populations are not going to go away. For the reasons listed above, **we urge the State to implement a full Medi-Cal Renewal Waiver - not just a delay in renewals.**

Please do not hesitate to contact us should you have any questions.

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Cc: Secretary Mark Ghaly, MD
President pro Tempore Toni Atkins
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