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October 28, 2011

Dr. Mitchell Katz, Director
Los Angeles County Department of Health Services
313 North Figueroa Street, Room 912
Los Angeles CA 90012

Re: Healthy Way LA Expansion—Comments and Recommendations

Dear Dr. Katz:

Community Health Councils (CHC) writes today on behalf of its LA Access to Coverage Coalition regarding the rollout of the county's Low Income Health Program (LIHP) *Healthy Way LA (HWLA)*. CHC is a non-profit community-based policy, advocacy and research organization committed to ensuring equitable access to quality, affordable coverage for underserved, under-resourced, and uninsured populations across the state.

California is in a critical phase in the planning, policy development, and implementation of the Affordable Care Act. Intended to create a "Bridge to Reform," the state's 1115 Medicaid Waiver lays the groundwork to ensure that millions of individuals can easily obtain coverage come 2014. As a result, the LIHPs provide a promising pathway to coverage for underserved and under-resourced communities. In Los Angeles County, the average monthly enrollment for HWLA was 1,400 individuals in 2010-2011. Since the launch of the new program in July, more than 27,000 new patients have been enrolled into HWLA.¹

With over 400,000 eligible individuals yet to be enrolled and the "Bridge to Reform" vision for HWLA, CHC and the LA Access to Coverage Coalition offer the following thoughts and recommendations to support the Los Angeles County Department of Health Services in realizing its goal.

Utilizing "Your Benefits Now" Will Streamline Enrollment and Maximize the County's Investment. One of the central tenets of the ACA is to facilitate seamless, timely enrollment into quality coverage. As a "Bridge to Reform," the HWLA program should also ensure that local administrative processes facilitate timely eligibility determination, enrollment, and access to healthcare services for patients. We understand that DHS is working with the Department of Public Social Services to begin using LEADER and the "Your Benefits Now" (YBN) Web Portal as the enrollment system for HWLA.² We support the use of this system and feel it is a right step toward full implementation of ACA for the following reasons:

¹ LA County Department of Health Services "Status Report on Healthy Way Los Angeles Enrollment" October 14, 2011.

² Ibid.

- All HwLA matched enrollees (who are under 133% FPL) will be covered under Medicaid come January 2014. Integrating the HwLA enrollees in the state's MEDS system prior to 2014 will help facilitate a seamless transition of coverage as required by the Center for Medicare and Medicaid Services.³ Using YBN as the initial enrollment systems places applicants into the local Statewide Automated Welfare System (SAWS) known as LEADER that automatically uploads to MEDS.
- Using YBN also allows clinics to meet the requirement to screen individuals for Medi-Cal prior to enrolling patients into HwLA. YBN will accurately and efficiently screen for Medi-Cal eligibility and quickly route to a local DPSS office for final determination, helping to eliminate backlogs.
- YBN helps streamline the eligibility process and eliminate unnecessary documentation by its use of Social Security data to verify identity and citizenship.
- Finally DHS staff have access to the LEADER system and can easily pull data once the individual is screened as HwLA eligible. This minimizes personnel costs at the county and clinic levels and optimizes the investment the county has made in the YBN system.

According to the County Welfare Directors Association, several counties are already exploring the option of using the Medi-Cal Public Access system that interfaces with their local SAWS. Similarly, the IT infrastructure models being considered by the California Health Benefits Exchange highlight coordination of information between SAWS and the Exchange central IT infrastructure as required by ACA.⁴ Transitioning LA County to the YBN system may facilitate future coordination with the Exchange to maintain coverage for individuals as life circumstances trigger changes in coverage.

Develop a Strong Public Outreach and Education Program on the Medical Home Model and HwLA Program. Despite strong enrollment into HwLA, communities continue to express confusion about how the program works. The lack of information regarding the new "medical home model" and HwLA unmatched program adds to the confusion. The concerns we have heard include, but are not limited to:

- HwLA patients are unfamiliar with the concept of and importance of a Medical Home. For many, being assigned to one clinic is perceived as limiting their access and is therefore a barrier to care.
- Lack of understanding about eligibility criteria is resulting in individuals above 133% FPL who are not eligible seeking services and those without proper documentation unclear about what is available to them.
- Additionally, the Department's hotline number does not provide information about the unmatched program.

We are aware that the county has been working with Service Employees International Union members to help eligible enrollees obtain information about the program; however, even these efforts have faced barriers. **We recommend DHS expand this effort and work with a broader range of stakeholder groups to develop and implement a comprehensive public education campaign that is culturally and linguistically appropriate and utilizes a wide range of traditional mass media, new marketing strategies and traditional community level outreach.** This campaign should educate the community about the entire HwLA program (Matched and Unmatched), Medical Homes, the application process and consumer rights (i.e. the ability to change medical homes if needed) and the concept of a medical home. If a public education campaign is currently under development, CHC and our coalition partners would like to be involved in the planning and execution.

³ 1115 Waiver Special Terms and Conditions at

<http://www.dhcs.ca.gov/provgovpart/Documents/Waiver%20Renewal/CA%20Special%20Terms%20%20Conditions.pdf>.

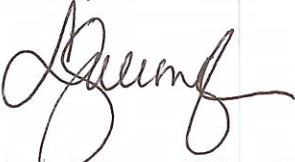
⁴ Patient Protection and Affordable Care Act of 2010 Subtitle C—Medicaid and CHIP Enrollment Simplification SEC. 2201. Enrollment, Simplification, and coordination with State Health Insurance Exchanges.

Utilize Existing Outreach and Enrollment Entities to Support Enrollment and Education.

Finally, we encourage the county to connect with the County Department of Public Health community-based contract enrollment organizations. These 15 contractors employ trained Certified Application Assistants (CAAs) who assist with Medi-Cal screening and applications, conduct outreach about all available healthcare programs, and are located throughout the county. These contractors can give the county additional support by providing the community with information about HWLA and by assisting at clinics that do not have onsite staff knowledgeable about the Medi-Cal applications.

We thank you for your attention to this matter. We welcome dialogue with you and your staff regarding our concerns and recommendations. If you require additional information or have any questions, please feel free to contact Sonya Vasquez, Policy Director, at 323.295.9372 or email svasquez@chc-inc.org.

Thank you,



Lark Galloway-Gilliam, MPA
Executive Director

cc: Sheryl L. Spiller, Acting Director, LADPSS
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