Dear Covering Kids and Families & LA Access to Health Coverage Coalition Members

As many of you know the Department of Health Care Services (DHCS) and the Managed Risk Medical Insurance Board (MRMIB) are contemplating redesigning the MC 321 Joint Application for Healthy Families and Medi-Cal for Children and Pregnant Women. Their reasoning is that "DHCS and MRMIB are revising the application to make clear that the application is an application for the Healthy Families Program (HFP) and a screening document used to evaluate eligibility for the Medi-Cal Federal Poverty Level (FPL) programs for children and pregnant women only."

Whereas they have stated that this does not change any policy with how the document is used once it is forwarded to the County Social Services office, it is our concern that this will cause confusion and is not necessary especially as we prepare for Health Reform. Along with members of the our CKF and LA Access Policy/Action Committees we have drafted comments to submit to DHCS.

Also attached is a copy of the proposed revised application for your review. In concert with other advocates we chose not to make any recommendations on improving this application but simply to state that the MC 321 should be kept as is, an application for Healthy Families and Medi-Cal for Children and Pregnant Women.

We apologize for the quick turn around but we need to get these comments to the state by Monday. We are still working on the structure of the letter but the overall concepts will remain. Therefore **if your organization is interested in signing on to the letter please let me know along with whose name and title should be added to the letter no later than Monday November 1st at Noon**.

If you have any questions, please do not hesitate to call or email me. Thank you in advance for your support.

Have a great weekend.

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October 25, 2010

Mr. Robert Sugawara
Assistant Chief of Medi-Cal Eligibility Division
STATE DEPARTMENT OF HEALTH CARE SERVICES
Sacramento, CA

Re: *Proposed Revision of the MC 321 HFP*

Dear Mr. Sugawara:

Community Health Councils (CHC) on behalf of the *Covering Kids* & *Families (CKF)* and *LA Access to Healthcare Coverage* Coalitions writes today to share our concerns about the redesign of the MC 321. Both the CKF and LA Access coalitions are convened by CHC and embrace a diverse membership of more than 100 active organizations across 30 counties representing under-resourced communities, local and state agencies, CBOs, and advocacy organizations. Many of these organizations collectively assist thousands of families each year with enrollment into Medi-Cal and Healthy Families.

We appreciate the opportunity to provide feedback and thank both the Department of Health Care Services (DHCS) and the Managed Risk Medical Insurance Board (MRMIB) for allowing ample time to provide comments. However, for the following reasons we recommend that MC 321 continue to function as an application for Healthy Families and Medi-Cal for children and pregnant women.

- **Why redesign the application:** Your initial email suggests that there is a need "to make clear that the application is an application for the Healthy Families Program (HFP) and a screening document used to evaluate eligibility for the Medi-Cal Federal Poverty Level (FPL) programs for children and pregnant women only." However, per the Medi-Cal Eligibility Procedures Manual (Letter 303 ~ 06/19/06), a joint mail-in application (MC 321) for HFP and Medi-Cal for Children and pregnant women was developed to adhere to Welfare and Institutions (W&I) Code Section 14011.1. As also noted in the Procedures Manual "the intent of this law is to provide easy access for this population to apply for and receive Medi-Cal benefits as quickly as possible." Therefore, it is unclear why there is a sudden need to change the original intent of the MC321 Joint Application, especially if there will be no change in any rules to determine eligibility.
- **Redesign will increase confusion for families:** We echo the concern of many advocates that the redesign will cause more confusion for families than clarification. Wording and language are everything when helping an already vulnerable population. Stating that this is a Healthy Families application may cause families to erroneously assume they must fill out a separate application for Medi-Cal. This would greatly weaken the "no wrong door" concept that was at the forefront of discussions when the Joint Application was originally designed in 1997 and then redesigned in 2008.
- **California should be preparing for Health Reform:** With implementation of the Patient Protection and Affordable Care Act (PPACA) comes the mandate of a single application for Medicaid, CHIP and the premium credit program in the Exchange. Given the need to move in this direction, California should not be

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dismantling the MC 321 but rather using it as a stepping stone for developing this required application.

- **Unnecessary Administrative Burden:** In a time of lean state budgets, it would seem that redesigning the application point would cause more burden, especially financial, on the administration. The cost of a reprint of the application alone is daunting, but any changes to the paper application would have to be reflected on Health-e-App, which is about to go public. This would further delay its launch, and the system would need to be reprogrammed to include the changes. Additionally, all local Medi-Cal offices have been told via several All County Welfare Letters (ACWL) that the MC321 can be used as a Medi-Cal application. Proposed changes to the MC321 will likely cause confusion for Eligibility Workers and lead to additional training and the production of further ACWL's to clarify the policy.
- **Medi-Cal Administrative Activities (MAA) billing problems**: Many counties have been able to use MAA claimable activities to support enrollment efforts. The MC 321 is currently an accepted form of documentation for "facilitating a Medi-Cal application". However, by eliminating the Medi-Cal logo and stating this is only a screening tool for Medi-Cal, there is concern that counties would not be able to continue to use this form as an MAA claimable activity. This issue needs more clarification before any changes are made to the application.

For these reasons we feel that the MC 321 Joint application needs to stay as it was intended, a joint application for Healthy Families and Medi-Cal for Children and Pregnant Women. However, we do want to acknowledge a few areas where we feel the revised application moves in the right direction with changes to the current MC 321.

- **Identification of Deemed Eligible**: To minimize the number of deemed eligible children who erroneously fill out an application versus being automatically enrolled, we support the addition of questions under #13. However, applicants should be clearly referred to the appropriate page in the booklet (page 5 on the current MC 321) so they see alternatives for receiving coverage other than completing the entire application (e.g., submitting a newborn referral or contacting the program to report the birth).
- **Identification of Children or Family Members with Disability**: The change to question #39 should be added to the current MC 321. It will help to identify whether a family received disability-based income to qualify them for a larger income disregard for some Medi-Cal programs. However, as with the questions added for identification of deemed eligible infants, this revised question should be added somewhere between questions #8 & #25 for each child in addition to keeping it under question #39. This will ensure that children who meet the category aren't missed and would also go a long way in expanding the reach of the application as we look towards Health Reform and expanding the "no wrong door" concept.

Whereas there can always be improvements to the MC321, we do not feel there should be any changes at this time other than the two mentioned above. If the state does want to make improvements on the MC321, we encourage you to convene multiple users forums to meet with consumers and Certified Application Assistants to ensure that the current application meets their needs.

We hope that DHCS and MRMIB will look favorably upon our recommendations and understand the need to keep moving forward in creating a system that improves access for Californians. Should you require additional information, please feel free to contact Sonya Vasquez, Policy Director, at 323.295.9372 extension 235.

Respectfully submitted,

Lark Galloway-Gilliam, MPA
Executive Director

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