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February 27, 2017

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*In memoriam*  
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Ms. Jennifer Kent, Director  
Department of Health Care Services  
P.O. Box 997413, MS 0000  
Sacramento, CA 95899-7413

Dear Ms. Kent:

I am contacting you on behalf of the California Association of Alcohol and Drug Program Executives, Inc. (CAADPE). We would like to take the opportunity to offer our comments on the Department of Health Care Services (DHCS) *Network Adequacy Policy Proposal* for Medicaid managed care. Our comments are as follows:


### Section 4.6 DMC-ODS Waiver Services- Substance Use Disorder

- CAADPE recommends a timely access standard of 3 business days for outpatient services, which is consistent with the Opioid treatment programs.
- CAADPE objects to the absence of time and distance recommendations of access for hospital detoxification, residential detoxification and residential services; and other MAT services which may not be opiate specific. We strongly recommend these levels of care be added. They are essential services and should not be left out of these standards.
- CAADPE recommends hospital and residential detoxification services with the same distance requirements as those cited for outpatient services; and with a timeliness access standard of 2 business days.
- For residential services in general, CAADPE recommends the same distance standard as outpatient services and a timeliness access standard of 3 days.

For individuals with substance use disorders the window for access to treatment is narrow and closes fast. The growing overdose statistics plaguing California and the nation are indicative of the need to speed up access to care. Delays in access to care often results in serious life-threatening consequences up to and including death from overdose. With this in mind, CAADPE appreciates your consideration of these recommendations.

Please do not hesitate to contact me via email at [asenella@tarzanatc.org](mailto:asenella@tarzanatc.org) or at (818)654-3815 should you have any questions.

Respectfully,

  
Albert M. Senella  
President