



**CONNECT  
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February 23, 2017

Department of Health Care Services  
P.O. Box 997413, MS 4400  
Sacramento, CA 95899-7413

RE: Network Adequacy Standards for Medi-Cal Managed Care

Dear Policy Coordinator:

On behalf of our 32,000 members, the California Association of Marriage and Family Therapists (“CAMFT”) thanks the Department for the opportunity to express our views regarding the Medicaid Managed Care Final Rule: Network Adequacy Policy Proposal. CAMFT represents the interests of mental health professionals of various disciplines, including 18,500 licensed marriage and family therapists, many of whom are Medi-Cal providers.

We would like the Department to clearly define the term “reasonable access” as it relates to non-specialty mental health services. The term “reasonable access” is used in Table 2 on page 13 of the policy proposal to describe current network adequacy standards as it pertains to time and distance standards.

On page 25 of the policy proposal, the Department offers a brief description of its Medi-Cal Managed Care Health Plan Monitoring efforts. We would like more information from the Department about how the quarterly and annual monitoring activities will be carried out. For example, are the activities planned or is monitoring carried out through undisclosed “secret shopper” activities. Within the discussion of its planned monitoring activities, the Department also indicates it will provide technical assistance to Managed Care Plans that are struggling to meet network adequacy standards. We would like more information about what types of help the Department will offer to the plans.

We appreciate your consideration of our comments and request for information.

Sincerely,

A solid black rectangular box redacting the signature of Sara Jasper.

Sara Jasper  
Staff Attorney

A solid black rectangular box redacting the signature of Jill Epstein.

Jill Epstein  
Executive Director