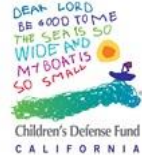




CHILDREN NOW



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October 20, 2016

Jennifer Kent, Director
Department of Health Care Services
1501 Capitol Avenue, Suite 6000
Sacramento, CA 95814

Dear Director Kent:

Thank you for the presentation on mental health and substance abuse treatment programs for Medi-Cal beneficiaries during the September 13 Medi-Cal Children's Health Advisory Panel (MCHAP) meeting. We appreciate your ongoing commitment and the efforts you are making to ensure mental health and substance abuse services are provided in our communities. We are pleased that the Department will continue this important discussion at the next meeting with another deep dive review of mental health in Medi-Cal.

While we appreciated the presentation regarding DHCS's approach for the adult population, we are concerned that the information provided on the unique mental health needs and entitlements for children was inadequate. As you are aware, nearly 6 million California children are served by the Medi-Cal program, which represents more than half of California's total child population.

In addition, while the county-specific information presented by Dr. Arroyo was interesting, we would like more information about how children receiving Medi-Cal reimbursed mental health services are faring state-wide, and how DHCS plans to ensure that county mental health plans are providing the entitled specialty mental health services to Medi-Cal beneficiaries under the age of 21. To that end, we hope that the following questions could be addressed at the upcoming meeting and/or at future MCHAP meetings:

1. While the county mental health programs are no longer responsible for providing education services for children in the mild to moderate categories of mental health diagnoses under AB 114, mental health parity and Early and Periodic Screening, Diagnosis and Treatment (EPSDT) is the ultimate responsibility of DHCS, under federal Medicaid law. How is DHCS ensuring that children are receiving all medically necessary mental health services as guaranteed by EPSDT?
2. How is the quality of care for children receiving mental health services through Medi-Cal managed care assessed? How is quality of care measured for pediatric specialty mental health care programs?
3. What assistance is available for health plans struggling to ensure adequate pediatric mental health providers in their networks? Are capitation rates adjusted to help plans fully implement EPSDT as it pertains to mental health?
4. What is the follow-up for referrals for children served through health plan arrangements established by the school districts for the mild to moderate category of diagnoses? What oversight of these arrangements does DHCS conduct in order to be fully compliant with EPSDT?

What collaboration/coordination occurs between DHCS and the California Department of Education regarding the delivery of mental health services for children enrolled in Medi-Cal?

5. The California State Auditor's Office issued a report in 2015 that estimated that of the 700,000 children identified as needing education-based mild to moderate mental health services, only 120,000 received care. What is DHCS' plan to improve delivery of services to those Medi-Cal children to be fully compliant with EPSDT and other federal regulations?
6. Emerging brain science shows the impact of adverse childhood events (ACEs) on the development of the brain and the long-term implications for mental and physical health. Medical science is beginning to show direct linkages between untreated trauma and ACEs and the onset of asthma, obesity, and diabetes, among other conditions. Has DHCS begun to address trauma-informed mental health services? Is DHCS reviewing current best practice standards and encouraging health plans to provide these services to children? Would DHCS consider forming a workgroup to consider standards and practices to improve trauma-informed mental health services for children in Medi-Cal, with the ultimate goal of producing long-term improved mental health and physical health outcomes?

We appreciate the opportunity to provide our feedback and DHCS' openness to stakeholder input.

Sincerely,



Ted Lempert
President
Children Now



Corey Timpson
Director
PICO California



Mark Diel
Executive Director
California Coverage & Health Initiatives



Mayra Alvarez
President
The Children's Partnership



Peter Manzo
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Alex Johnson
Executive Director
Children's Defense Fund – California

cc: Members of the Medi-Cal for Children's Health Advisory Panel