



*Supporting People,
Health and
Quality of Life*

April 23, 2015

Ms. Vicki Wachino, Acting Director
Centers for Medicare & Medicaid Services
Center for Medicaid & CHIP Services
7500 Security Boulevard, Mail Stop: S2-26-12
Baltimore, Maryland 21244-1850

**SUBJECT: COMMENTS ON CALIFORNIA'S SECTION 1115 WAIVER DEMONSTRATION:
MEDI-CAL 2020**

Dear Ms. Wachino:

California has submitted an application to renew its section 1115 demonstration effective November 1, 2015. The state requests a five-year extension. California seeks to continue many of its existing demonstration initiatives and seeks to expand access, improve health quality, equity, and outcomes, and control health care costs for Medi-Cal beneficiaries.

The California Association of Health Facilities (CAHF) is a non-profit professional association founded in 1950 to serve as a statewide organization for long-term care providers. CAHF's membership is comprised of more than 1,300 licensed non-profit and proprietary long-term care facilities serving a wide spectrum of needs in settings which include skilled nursing, intermediate care, subacute, mental health, and services for persons with developmental disabilities. Nearly 100,000 trained medical professional and support service staff care for 300,000 Californians in these facilities each year.

The waiver provides the Coordinated Care Initiative (CCI) would continue through the waiver renewal, but is not specific as to the timeframe for continuance. CAHF requests that CMS not approve any extension of the CCI beyond the three-year demonstration period until there is a full and complete evaluation of the pilot program. We believe that such an evaluation should include, among other things, measuring the impact of the CCI on the provider community in serving beneficiaries, including acute care hospitals, physicians, ancillary providers and skilled nursing facilities. It should also include a cost/benefit analysis to both CMS and the State of California, as well as, provider input as to continuity and interruption of care and general provider satisfaction.

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Ms. Vicki Wachino
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Thank you for the opportunity to provide comment.

Sincerely,



James H. Gomez
CEO/President

cc: Jennifer Kent, Director
Department of Health Care Services
Mari Cantwell, Chief Deputy Director, Health Care Programs
Department of Health Care Services