THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLOOR
BERKELEY, CA 94704
GREENLINING.ORG

January 14, 2013

Mr. Peter Lee, Executive Director
California Health Benefit Exchange
560 J Street, Suite 290
Sacramento, CA 95814

Comments to the Board on the Proposed Bridge Plan to Promote Affordability and Promote Continuity of Care

Dear Mr. Lee:

The Greenlining Institute is writing to provide comments on the Bridge Plan options presented at the December Covered California Board meeting, and updated on January 10, 2013. As an organization dedicated to ensuring quality and affordable access to health care services for California's diverse communities, we are pleased that the Board is examining this option in order to increase the affordability options offered in the Exchange, while also looking to promote continuity of care and maintaining a strong safety net. We would like to note, however, that we remain in support of the Basic Health Plan option because we feel that it will ensure consumers of color have access to affordable, quality health plans. Understanding that the Basic Health Plan's future is uncertain, we look forward to working with Covered California to develop and explore potential options for an affordability plan. While we support the Bridge Plan option presented, we do have some concerns that the proposed recommendations, as outlined, will not achieve the intended goals of affordability and continuity of care.

Participation Mechanisms

We support the recommendation to allow any Medi-Cal Managed Care plan the option to contract with Covered California because we believe this option has the best promise to ensure more choice for consumers. Further, in regions with more than one "lowest-cost" silver plan, these plans would likely be forced to compete on quality and not just cost measures, potentially increasing overall standards for coverage within these plans.

Consumer Eligibility

We urge Covered California to increase eligibility to *all* eligible Californians up to 250% FPL by merging Recommendations 1 and 2. This will ensure continuity of care for the current Medi-

Greenlining Coalition:
Allen Temple Baptist Church
American GI Forum
AnewAmerica
Asian Business Assn
Asian Inc
Black Business Assn.
Brightline Defense Project
California Black Chamber
California Hispanic Chambers
California Journal for FilAm
California Rural Legal Assistance
Chicana/Latina Foundation
Chicano Federation, San Diego
Community Child Care Council
Community Resource Project
Council of Asian American Business Assn.
El Concilio of San Mateo County
Ella Baker Center
FAME Renaissance
Greater Phoenix Area Urban League
Hispanic American Growers Assn.
Hmong American Political Assn.
KHEIR Center
La Maestra Family Clinic
Mexican American Grocers Assn.
Mexican American Political Assn.
Mission Language & Vocational School
Mission Housing Development Corporation
National Federation of Filipino American Assn.
Oakland Citizens Committee for Urban Renewal
Our Weekly
Precinct Reporter Group
Sacramento Observer
San Francisco African American Chamber
San Francisco Housing Development
Search to Involve Pilipino-Americans
Southeast Asian Community Center
TELACU
Ward Economic Development
West Angeles Community Development

Board of Directors:
Rosario Anaya
Robert Apodaca
Jessie Buendia
George Dean
Alfred Fraijo, Jr.
Yusef Freeman
David Glover
Ortensia Lopez
Darlene Mar
Olga Talamante
Tunua Thrash
Executive Director: Orson Aguilar
General Counsel: Samuel S. Kang
Program Directors:
Daniel Byrd
Stephanie Chen
Virginia Hill
Janine Macbeth
Braelan Murray
Claudia Paredes
Michelle Romero
Carla Saporta
Vien Truong
Preeti Vissa

Cal/CHIP population, while including those up to 250% FPL that do not qualify for other affordability options. This population is still likely to not be able to afford an equivalent plan offered in the Silver tier, making it necessary to provide more options for coverage.

Ensuring Affordability
It is unclear from the proposed plan how Covered California will be able to ensure affordability over time. Further, it appears the focus on affordability is targeting the overall premium costs for consumers, which is necessary, but the current standard benefit designs have consumers with incomes between 150% and 200% FPL paying unaffordable co-pays, such as $20 for a doctor visit. We understand that Covered California is taking steps towards ensuring affordable cost-sharing for consumers, and want to reiterate the importance of addressing what affordability looks like in regards to all out-of pocket expenses for the consumer.

Provider Networks
We appreciate the focus on providing affordable plan options to potentially reduce churn for populations that experience income fluctuations and that would otherwise shift their eligibility between Medi-Cal and Covered California. As the recommendations highlight, ensuring continuity of care goes beyond the affordability of a plan but also a consumer's access to a known provider.

We are concerned that the options under Recommendation 3 suggest that Medi-Cal Managed Care plans have already satisfied the Essential Community Provider network requirements by virtue of the composition of their typical networks. Many safety net providers may not be a part of these provider networks and we feel it's prudent that any participating plan demonstrate their ability to provide a robust provider network, particularly a network that can provide culturally and linguistically appropriate care to Californians of color, prior to contracting with Covered California.

In weighing these options, we believe that the recommendations would need to be implemented together, rather than choosing one option over the other, in order to ensure that the true intent of the plan comes to fruition. Thank you for your consideration of our comments.

Best,

Carla Saporta
Health Policy Director
Bridges to Health

CC: Covered California Board Members