January 14, 2013

Peter V. Lee, Executive Director
Covered California
2535 Capitol Oaks Drive, Suite 120
Sacramento, CA 95833

Submitted electronically to info@hbex.ca.gov

Re: Proposed Bridge Plan: Continuity of Care & Affordability

Dear Mr. Lee and Members of the Board:

On behalf of Californians for Patient Care, thank you for the thoughtful work that went into developing the Bridge Plan, proposed by Covered California on January 10, 2013. As an independent, nonprofit, patient-advocacy and consumer-assistance organization, Californians for Patient Care generally supports the proposed transition of existing Medi-Cal or Medi-Cal/CHIP patients into a Medi-Cal managed care plan for several reasons; however, we also have concerns about the proposal we recommend you address to ensure a seamless and beneficial transition for patients.

Benefits: Continuity of Care and Ease of Enrollment

The Bridge Plan proposed by Covered California would allow current Medi-Cal and Medi-Cal/CHIP patients to retain their current provider networks, which greatly encourages continuity of care. Californians for Patient Care is pleased to see that a high number of former Healthy Families patients and their parents might benefit from the Bridge Plan because those families have already been through one major healthcare transition, and we would discourage any further disruptions to their healthcare.

Along with maintaining continuity of care, the proposed Bridge Plan removes some of the confusion these consumers are bound to experience in the Covered California enrollment process. If Covered California can effectively communicate how the Bridge Plan mimics current Medi-Cal and Medi-Cal/CHIP plans, demonstrating a true "apples-to-apples" comparison, Californians for Patient Care believes consumers will be highly incentivized to enroll in the Bridge Plan and therefore participate in Covered California.

Because we believe continuity of care is critical to patients' health as well as their satisfaction with Covered California, and because we believe it will provide current enrollees with a cost-effective, familiar health plan option, we support Covered California's proposal of the Bridge Plan.

We do have, however, concerns and recommendations related to access to care and administration.

1017 L Street, PMB 718 · Sacramento, CA 95814 · Main | 916.444.5255 · Fax | 916.444.5256
www.calpatientcare.org

Concerns: Provider Network Capacity, Impacts to Medi-Cal Patients in Managed Care Plans That Don't Participate

Recommendation #1

The May 2012 California Health Care Foundation report, "Medi-Cal at a Crossroads: What Enrollees Say about the Program," indicates that Medi-Cal patients are extremely satisfied with their access to (primary care) medical care. Californians for Patient Care is concerned that roughly one million people would be eligible for the Bridge Plan. Medi-Cal managed care plans that qualify as bridge plans may not have the network capacity to care for this additional patient population and the administrative costs of expanding network adequacy may negate any net cost benefit to patients.

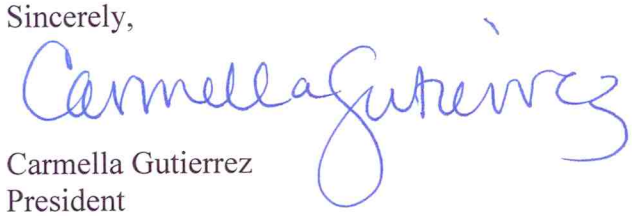
In addition, with California's Medi-Cal reimbursement rates being the 48th lowest in the country, Californians for Patient Care is concerned that there may not be enough providers willing to care for patients at existing Medi-Cal reimbursement rates, which would even further exacerbate continuity of care problems. We would not want the addition of the Bridge Plan to compromise the high levels of patient satisfaction of current Medi-Cal patients or to disrupt the continuity of care they already enjoy. We, therefore, respectfully request a thorough readiness assessment of potential managed care bridge plans and their provider networks be conducted by Covered California and the results of that assessment be made available for public comment prior to implementation.

Recommendation #2

In the proposed Bridge Plan, Covered California indicates that "Consistent with federal guidance, this proposal would allow individuals transitioning from Medi-Cal or Medi-Cal/CHIP coverage to Covered California to stay with the same issuer and provider network." What happens to patients if their current issuer opts not to become a Qualified Health Plan (QHP) through Covered California? Or will all current Medi-Cal and Medi-Cal/CHIP issuers automatically become qualified? If they aren't automatically qualified, how will patients be informed of their plan choices and continuity of care be maintained and communicated? If health plans are automatically qualified, how does that affect other coverage issuers' views of Covered California and the qualification process? Californians for Patient Care recommends that additional information on this issue be distributed as quickly as possible.

Like Covered California, Californians for Patient Care believes that millions of Californians will benefit from the implementation of healthcare reform and the healthcare exchange. The Bridge Plan goes a long way to ensure continuity of care by maintaining provider networks, which in and of itself will help eliminate confusion among eligible enrollees. Additional information on the providers' readiness to serve this growing patient population and how current Medi-Cal and Medi-Cal/CHIP providers will be become QHPs will only bolster Californians for Patient Care's support of this proposal.

Sincerely,



Carmella Gutierrez
President