



California Coalition for Whole Health

June 11, 2012

Peter Lee, Executive Director
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California Health Benefit Exchange
1500 Capitol Avenue
Sacramento, CA 95814

SUBJECT: Invitation to Provide Public Comment – Statewide Assisters Program Design Options

The California Coalition for Whole Health (CCWH) is a diverse group of behavioral health stakeholders concerned with informing the implementation of the Patient Protection and Affordable Care Act (ACA) to appropriately address mental health and substance use disorder treatment needs. The California Coalition for Whole Health took root in the national Coalition for Whole Health, a group of over a hundred organizations in the mental health and addictions fields from across the nation with shared interest in ensuring appropriate inclusion of behavioral health issues in ACA implementation activities. CCWH hopes to serve as an important resource to the California Health Benefit Exchange board and staff as it moves forward in implementing the Assisters Program and ensuring California consumers receive the essential assistance necessary to help navigate the complex health coverage market and programs.

The California Coalition for Whole Health would like to focus our comments on the training and curriculum standards for the Assisters Program. Foremost, CCWH strongly encourages the Program to include a comprehensive training component related to mental health and substance use disorder parity and equity laws as they apply to qualified health plans, the scope of mental health and substance use benefits typically available to consumers by qualified health plans and public coverage options. CCWH has noted that too often consumers are misinformed about their mental health and substance use benefits which can hinder them from accessing necessary service in a timely manner. Lack of timely access to appropriate, mental health and substance use disorder services can cause conditions to worsen and lead to costly emergency and inpatient care.

California's mental health and substance use disorder community has been monitoring issues of consumer access and parity compliance for years. There have been a number of consumer resources developed over the years, some in partnership with the regulatory bodies, to help consumers better understand their rights related to accessing necessary mental health and substance use disorder services. CCWH would very much like to work with the California Health Benefits Exchange to leverage existing resources to support the development of the Assister Program training curriculum. Additionally, the Exchange may find some of these existing resources to be useful to make available to enrollees in qualified health plans.

Finally, it should be noted that the management and provision of mental health and substance use disorder services in today's small group and individual market varies significantly by health

plan and insurance carrier. Many health plans and insurance carriers choose to “carve out” these benefits to partner behavioral health organizations. While this structure should, in theory, be seamless to the beneficiary, more often than not it can leave consumers confused and misinformed – and services uncoordinated. It will be important for certified navigators and direct benefit assisters to understand this structure in order to appropriately inform consumers about how to navigate this potential complexity in order to ensure appropriate access to covered benefits.

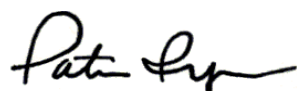
Thank you for your continued commitment to and leadership in the development and implementation of California’s health benefits marketplace. We welcome the opportunity to discuss our comments and work collaboratively with the Exchange to further strengthen the Assisters Program. Specifically, CCWH offers our support to the Exchange board and staff to be a resource in the curriculum development process to ensure that issues related to mental health and substance use disorder coverage are appropriately addressed. CCWH will be convening an internal workgroup of consumer advocates in order to further develop specific training and curriculum recommendations to inform the Assisters Program and welcomes the opportunity to share those on an ongoing basis. Any questions may be referred to Renee Verducci at rverducci@cimh.org.

Sincerely,

Undersigned representatives of the California Coalition for Whole Health:



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