July 1, 2021

Director William Lightbourne
California Department of Health Care Services
1501 Capitol Avenue, MS 0000
P.O. Box 997413
Sacramento, California 95899

Submitted via email to CSBRFP8@dhcs.ca.gov

Subject line: **Draft Request For Proposal #20-10029**, **Medi-Cal Managed Care Plans**

To Whom It May Concern:

We submit these comments on the Draft Request For Proposal #20-10029, Medi-Cal Managed Care Plans led by the Department of Health Care Services (DHCS).

As education stakeholders, we bring a school lens to our review, noting that the RFP draft is missing a number of critically important components, without which, it is impossible to evaluate it. This is especially true in light of the newly emerging role of schools as an essential part of the healthcare system, as evidenced in the governor's budget and approved Trailer Bill Language, both of which begin to respond to the youth mental health crisis gripping our state.

The budget includes an investment of $20 billion to make schools gateways of health and equity with 20% of those funds —$4 billion dollars—dedicated to transforming California's behavioral health system. The budget centers both schools (as the sites where most children can be reached) and MCOs (as the payors) in reimagining our system to support youth mental health and wellness. And given our state ranks 44th in the nation in access to behavioral health care among children in Medi-Cal–81% of whom are Black or brown–this is long overdue.

In spite of this, the RFI has scant mention of schools (none whatsoever in the Main RFP document), there is no mention of the new role schools will play in partnership with MCOs and nothing about contracting and who pays for what in providing school-based mental health services at the scale currently envisioned. This must be included in the final RFP if the state is to assess bidders appropriately.

The proposed draft RFP:

- References requirements for MCOs to have MOUs with LEAs for care coordination purposes for students with IEPs (Exhibit A, Att III Section 4.3.12 / Page 126 of 256 and Section 5.6.1 - page 227 of 256). Care Coordination is a covered benefit for MCO beneficiaries regardless of the IDEA status and the proposed contract language does not have adequate accountability measures to ensure compliance.
- Does not mention school counselors or behavioral health coaches (a new provider class) both of whom will be essential players in the MCO networks and essential to meeting demand/need, containing costs and addressing workforce shortages.
- Does not address a rate setting structure for the new behavioral health coaches.
- Does not provide detail on peer to peer programs in schools.
- Is silent on the role of Community Schools whose central tenets include integrated services and shared governance by engaging youth and families -- which will be critical to the success of any solution at scale.

- Requires MCOs to have LEAs represented on their Community Advisory Committees and Governing Boards (which is good), but this requirement must extend to our students and families as they are the most impacted and also the most outspoken about the need to improve services to address their mental health and well being.
- Must make explicitly clear that a diagnosis is not required in order for a child to receive mental health services in schools and elsewhere. We believe students (with their caregivers / families / trusted adults) are experts in their own lived experiences and should be able to determine whether their experiences rise to the level of needing emotional support.

In addition, DHCS is still working on critical aspects of the RFP including Narrative Proposal Requirements, Evaluation and Selection, and Evaluation Questions. With these sections missing, an honorable review of the draft is not possible. Because of this and the fact that the draft does not mention important new proposals related to the central role of schools in addressing youth mental health for our state's most vulnerable youth, we request that the Department issue new and complete RFP drafts for public review in advance of issuing a final RFP.

Respectfully submitted,

Loretta Whitson
Executive Director
California Association of School Counselors

Taryn Ishida
Executive Director
Californians for Justice

Laura Zavala
Director of Policy and Campaign Development
InnerCity Struggle

Terry Supahan
Executive Director
True North Organizing Network

Sergio Luna
Director of Organizing
Inland Congregations United for Change (ICUC)

Miguel Hernandez
Executive Director
Orange County Congregation Community Organization (OCCCO)

Gabby Trejo
Executive Director
Sacramento Area Congregations Together (SacACT)

Pastor James Hopkins
Board Co-Chair
Faith in Action East Bay

Teresa Flores Onofre & Sergio Luna
Anchor Leads
PICO CA Education for Liberation

Alex Briscoe
Principal
California Children's Trust