

July 1, 2021

Connecting for Better Health Coalition  
80 E. Sir Francis Drake Blvd.  
Larkspur, CA 94939

Christina Soares, Chief, Contract Services Branch  
Department of Health Care Services  
Contract Services Branch  
1501 Capitol Avenue  
Sacramento, CA 95814

Re: Medi-Cal Draft RFP # 20-10029

Dear Chief Soares:

[Connecting for Better Health](#) is a coalition representing consumer groups, health care providers and health plans that together serve over 22 million Californians and are dedicated to the advancement of HIE policy in California. In developing this response, we incorporated the coalition's policy goals that underpin all our work:

- Compel every provider and health plan to share needed data so that the whole care team, regardless of where they are in the state, has the information they need to serve their patients.
- Secure an ongoing source of funding. Other states have leveraged available federal funding to build robust health information exchange infrastructure. It is time for California to do the same.
- Provide for needed statewide data sharing infrastructure while leveraging regional efforts, making sure every stakeholder has the appropriate support to participate.

We thank the Department of Health Care Services (DHCS) for the opportunity to provide comment on the Draft Medi-Cal Managed Care RFP #20-10029. We specifically seek to provide feedback on those **RFP provisions related to Population Health Management (Ex. A, Att. II, Ex. A. Att. III)**, as those provisions relate to the May Revision of the Governor's Budget, Department of Health Care Services Highlights published May 14, 2021. We raise several concerns and questions with the Population Health Management Service proposed in the May Revision that are likely to affect these various provisions of the MCP RFP regarding Population Health Management.

RFP Reference	Section and Page Number	Issue, Question or Comment	Remedy Sought
<p>Population Health Management (Ex. A, Att. II, Ex. A. Att. III)</p>	<p>Ex. A, Att. II, referencing Att. III section 4.3</p> <p>Ex. A, Att. III, Sec. 4.3</p>	<ul style="list-style-type: none"> <li>● <b>No participation mandate:</b> The proposal does not include a stated intent to require clinical and claims data sharing participation from all plans <i>and</i> providers. All health care organizations need to share data to support the population health activities outlined in the proposal including identifying high-risk patients and coordinating care across the entire care team.</li> <li>● <b>Limited population scope:</b> The proposal leaves out the benefits of the solution for the millions of Californians who are uninsured or covered by Medicare or commercial insurance. We believe a statewide solution must serve all Californians, and at a minimum, the inclusion of CalPERS and Covered California within the scope of the solution helps the state reach more of the population with data sharing.</li> <li>● <b>Lack of integration of existing investment in data sharing infrastructure:</b> The proposal does not specify if or how the procured</li> </ul>	<ul style="list-style-type: none"> <li>● Work with the Legislature and Administration to expand the Population Health Management Service’s purview beyond DHCS programs to all Californians. Alternatively, at the very least, expand the Service beyond DHCS programs to also include Covered California and CalPERS;</li> <li>● Compel health plan and provider contribution of administrative <i>and</i> clinical data to the Population Health Management Service; and</li> <li>● Integrate existing regional HIOs, other health plan population health efforts, and public health IT infrastructure into the Population Health Management Service.</li> </ul>

		<p>solution will leverage regional health information organization (HIO) efforts or support MCPs' population health management data initiatives—both of which have already received significant financial investment from plans, providers, and the state. Nor does the proposal discuss how the solution will integrate with existing public health IT systems like CalREDIE and CAIR.</p>	
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We thank you for your leadership on the issue of health information exchange. If you have any questions, please contact Robby Franceschini at [robby@connectingforbetterhealth.com](mailto:robby@connectingforbetterhealth.com).

Sincerely,

Connecting for Better Health