



Enrollment Strategy for Los Angeles County into Cal MediConnect DRAFT: December 9, 2013

The Memorandum of Understanding (MOU) signed between the Department of Health Care Services (DHCS) and the Centers for Medicare & Medicaid Services (CMS) in March 2013 required California to present an enrollment proposal for Los Angeles County. In accordance with the MOU, that original proposal was posted for a 30-day public comment. While that public comment period had been completed, due to important changes in Los Angeles County and a commitment to adhere to the intent of the MOU, DHCS is re-releasing this updated Los Angeles enrollment strategy document for public comment prior to finalization. DHCS encourages comments be submitted by **December 16, 2013** to <u>info@calduals.org</u>.

Los Angeles County Eligible Population and Cal MediConnect County Enrollment Cap

It is estimated that 288,399¹ Medicare and Medi-Cal beneficiaries are eligible for passive enrollment into a Cal MediConnect health plan in Los Angeles County. Passive enrollment will only occur after the rigorous plan readiness review process conducted by CMS and DHCS is complete. The agreement with CMS calls for a county enrollment cap of 200,000. DHCS will implement and manage a waiting list when 200,000 beneficiaries have enrolled in Cal MediConnect. If enrollment declines after the enrollment cap is reached, then DHCS will enroll those on the waiting list up to the enrollment cap. Priority on the waiting list will be given to those who have chosen to "opt-in" to Cal MediConnect, followed by those who are scheduled to be passively enrolled.

Overview of the Proposed Cal MediConnect Enrollment Strategy for Los Angeles County

With additional detail available in the below chart, steps for the Enrollment Strategy include:

- 1. All eligible beneficiaries may voluntarily enroll into Cal MediConnect no sooner than April 1, 2014.
- 2. Following the three-month, opt-in enrollment period, beneficiaries eligible for passive enrollment who do not choose to opt-in will be enrolled by their birth month, under the following conditions:
 - DHCS and CMS will not allow a Cal MediConnect plan to receive passive enrollment if it fails to show readiness or has a CMS' Low Performing Icon (LPI).
 - Health Net will receive passive enrollment starting no sooner than July 1, 2014.
 - Assuming LA Care no longer has an LPI in the 2015 CMS star ratings, DHCS and CMS anticipate that it could begin to receive passive enrollment no sooner than December 1, 2014.
 - Using available claims data, DHCS will work to identify beneficiaries whose primary care provider is only affiliated with LA Care (including sub-contractors). In order to protect continuity of care, such beneficaires will be passively enrolled into LA Care no sooner than December 2014, regardless of birth month.
 - In accordance with CMS policy, those dually eligible beneficiaries who are currently enrolled in the Medi-Cal managed care product sponsored by Health Net or LA Care will be enrolled into the Cal MediConnect product offered by the same plan, effective July 1, 2014.
 - Under California law, beneficiaries currently in a Medicare Advantage product will be enrolled in Cal MediConnect on January 1, 2015.²
 - Beneficiaries who are 2014 Medicare Part D Low Income Subsidy (LIS) re-assignees will be enrolled on January 1, 2015.
 - Persons who opt-out of Cal MediConnect will not be passively enrolled at any point into Cal MediConnect.
 - All beneficiaries in the Multipurpose Senior Services Program (MSSP) will be passively enrolled into Cal MediConnect on January 1, 2015. (5,000 est.).

¹ DHCS, Enrollment Data Analysis by DHCS, May 2013, which shows that there are 65,000 persons in DSNP/Medicare Advantage. This is an updated analysis based on actual Medi-Cal enrollment, and it superceeds the analysis by the DHCS Research and Analytic Studies Branch released in November 2012 based on July 2010 data.

² Welfare and Institutions Code, Article 4, Section 14132.277

Context: Cal MediConnect Notices and the Medi-Cal Managed Care Transition

The purpose of this paper is to explain the LA enrollment strategy for Cal MediConnect. DHCS welcomes stakeholder input. DHCS will address enrollment strategies for mandatory enrollment of dual eligibles into Medi-Cal managed care and MLTSS in a future document.

Proposed Cal MediConnect Enrollment Timeline for Los Angeles County (LAC)

Period of Enrollment	Population	Estimated Passive Enrollment in LAC
April – June 2014	Beneficiaries who opt-in to Cal MediConnect	No Passive Enrollment
July 2014 – November 2014	Beneficiaries with July- November birthdays	73,405 ³
	Beneficiaries currently enrolled in a Medi-Cal product sponsored by Health Net or LA Care	21,311
December 2014 – June 2015	Beneficiaries with December- June birthdays	102,765 ⁴
	2014 Medicare Part D Low- Income Subsidy (LIS) plan re- assignees ⁵	20,164
January 2015	Beneficiaries enrolled in a Medicare Advantage Product in 2014 ⁶	65,754
	All beneficiaries in the Multipurpose Senior Services Program (MSSP) – Enrolled all at once on January 1, 2015	5,000
Estimated total beneficiaries eligible for passive enrollment		288,399

³ This estimate is overstated. Beneficaries with a primary provider affiliated only with LA Care will be held back until LA Care can accept passive enrollment. HealthNet passive enrollment will go forward.

⁴ This estimate is understated. Please see Footnote 3. A greater portion of persons in this period will be passively enrolled in to LA Care to offset the Health Net enrollment that occurred in July to November.

⁵ This estimate is based on historical numbers of re-assignees, per CMS analysis. Enrollment will be coordinated with CMS' annual reassignment process to avoid assigning an individual to a new Part D plan and then moving him or her to a MediConnect plan in the same year. Reassignment occurs in October for individuals who quality for extra help or are enrolled in terminating Medicare Advantage or Part D plans.

⁶ Welfare and Institutions Code, Article 4, Section 14132.277