



March 12, 2021

Will Lightbourne
Director

Department of Health Care Services
P.O. Box 997413, MS 0000
Sacramento, CA 95899

RE: ECM & ILOS Draft Document Comments

Dear Mr. Lightbourne:

We, the undersigned, are writing to thank you for the inclusion of medically-supportive food and nutrition in the revised CalAIM proposal. If these changes are approved in the final waiver application, California will join Massachusetts, North Carolina and Oregon in providing comprehensive medically-supportive food and nutrition benefits to eligible Medicaid recipients. These interventions improve health care outcomes, reduce health care costs and mitigate health disparities. To ensure that the intent of the revisions are as clear as possible and are consistently communicated throughout implementation, we respectfully request some changes to the CalAIM proposal and the Enhanced Care Management (ECM) and In Lieu of Services (ILOS) draft documents.

Our coalition of more than 100 organizations is excited by the critical first step of including medically-supportive food interventions in the revised CalAIM proposal as part of the “Meals/Medically Tailored Meals” ILOS benefit (page 217). For added clarity and to better reflect the inclusion of medically-supportive food and nutrition in the CalAIM proposal, we request the following edits:

- Rename the ILOS category “Medically-Supportive Food/Meals/Medically Tailored Meals”
- Rephrase the 4th bullet to read “Medically-supportive food and nutrition services including medically tailored groceries, healthy food vouchers and food pharmacies. Behavioral, cooking and/or nutrition education when paired with direct food assistance enumerated above.”
- Add a 5th bullet reading: “Administrative, application, and enrollment support to help with transportation to food and linkages to additional food supports (CalFresh, WIC, etc.).”

In addition, we request the following edits to the ECM & ILOS Draft Documents:

Model of Care Template:

- Page 5, third to last bullet: replace “Meals/Medically Tailored Meals” with “Medically-Supportive Food/Meals/Medically Tailored Meals”
- Page 6, first full paragraph: add medically-supportive food and nutrition providers
- Page 57, 3.b.xii: replace “Meals/Medically Tailored Meals” with “Medically-Supportive Food/Meals/Medically Tailored Meals”

Rationale: Each of these changes clarify and better reflect that food-based ILOS services include medically supportive foods, and are not limited to meals. They also acknowledge that food-based services may be provided by additional providers beyond those originally listed.

Provider Standard Terms and Conditions:

- Page 9, 2.c.xii: replace “Meals/Medically Tailored Meals” with “Medically-Supportive Food/Meals/Medically Tailored Meals”

Rationale: This change reflects the inclusion of a broader range of healthy food supports that include, and are not limited to, meals and medically tailored meals.

Contract Template Provisions

- Page 20, 2.a.xii: replace “Meals/Medically Tailored Meals” with “Medically-Supportive Food/Meals/Medically Tailored Meals”
- Page 21, 3.a: add Medically-Supportive Food & Nutrition Providers

Rationale: Each of these changes clarify and better reflect that food-based ILOS services include medically supportive foods, and are not limited to meals. They also acknowledge that food-based services may be provided by additional providers beyond those originally listed.

Coding Options

- Page 5: rename “Meals/Medically Tailored Meals Category” to be “Medically-Supportive Food/Meals/Medically Tailored Meals”
- Page 5: In the Medically-Supportive Food/Meals/Medically Tailored Meals category add a new code with HCPCS Description “Medical food; per service”
- Page 5: In the Medically-Supportive Food/Meals/Medically Tailored Meals category add “S9470: Nutritional counseling, dietitian visit”
- Page 5: In the Medically-Supportive Food/Meals/Medically Tailored Meals category add “S5170: Home delivered meals, including preparation, per meal”
- Duplicate code “H2014: Skills training and development; per 15 minutes” (page 4) in the Medically-Supportive Food/Meals/Medically Tailored Meals category (page 5) in recognition of the available behavioral, cooking and/or nutrition education
- Duplicate code “H2016: Comprehensive community support services; per diem” (page 2) in the Medically-Supportive Food/Meals/Medically Tailored Meals category (page 5) in recognition of the available administrative, application, and enrollment support to help with transportation to food and linkages to additional food supports

Rationale: Each of these changes clarify and better reflect that food-based ILOS services include medically supportive foods, and are not limited to meals. In addition, “inborn errors of metabolism” are a rare subset of conditions that require medically supportive food. Medically-supportive food and nutrition services are fundamental to preventing, managing, and treating a broad range of health conditions. Therefore, we need S9470, S5170 and a new code that accurately reflects the scope of conditions that benefit from medically-supportive food and nutrition interventions. Lastly, the inclusion of H2014 and H2016 account for the services enumerated at the start of this letter.

We are encouraged to see the inclusion of more comprehensive food-based benefits in the CalAIM proposal. Offering this broader range of medically-supportive food and nutrition interventions allows for increased patient autonomy and more culturally relevant support in addition to improved health outcomes. To secure these positive outcomes we strongly encourage the above changes as California moves from policy to implementation.

If there’s any additional information we can get you or questions we can answer about these requests, please let us know by reaching out to Katie Ettman, Food and Agriculture Senior Policy Associate, SPUR at kettman@spur.org or 315-576-1909. Thank you for your consideration of these comments.

Sincerely,

Conrad Amenta, Executive Director, San Francisco Marin Medical Society

Cissie Bonini, Executive Director, Vouchers 4 Veggies – EatSF

Andrew Cheyne, Director of Government Affairs, California Association of Food Banks

Larissa Estes-White, DrPH and Director, ALL IN Alameda County

Katie Ettman, Food and Agriculture Senior Policy Associate, SPUR

Christine Farren, Executive Director, CUESA

Erin Franey, Program Manager, Food is Medicine Collaborative

Kathryn Garfield, Clinical Instructor, Center for Health Law and Policy Innovation, Harvard Law School

Allison Goodwin, Director of Programs, Redwood Empire Food Bank

Sara Housman, Co-chair, Nutrition and Fitness Collaborative of the Central Coast (NFCCC)

Marium Husain, Physician and Vice Present of IMANA, IMANA – the Islamic Medical Association of North America

Michael Janis, General Manager, The SF Market

David Kane, Staff Attorney, Western Center on Law and Poverty

Michele Lew, CEO, The Health Trust

George Manalo-LeClair, Executive Director, Nourish California

Adrienne Markworth, Executive Director, Leah's Pantry

Kimberly Newell Green, MD

Zettie D. Page III, MD, Ph.D., MBA, MSW, MS, Chief Executive Director, Bay Area Community Health

Hester Parker, PhD, Board President, Everyone's Harvest

Jessica Ridgeway, Executive Director, Farm Discovery at Live Earth

Emma Steinberg, MD, Chef

Ann Thrupp, Director, on behalf of the California Food is Medicine Coalition

Tracy Weatherby, VP Strategy & Advocacy, Second Harvest of Silicon Valley