January 17, 2018

Dear CCS Redesign Team:

We are writing to provide comments on the Department’s proposed requirements for an adequate CCS provider network in the COHS plans that will implement the Whole Child Model. These comments, which are in response to slides 11 and 12 in the Department’s PowerPoint presented at the January 10, 2018 meeting of the CCS Advisory Group, are provided below:

Each WCM MCP must have an adequate network of CCS-paneled providers for the following provider types and facilities:

1. Physicians/Pediatric Specialists and Subspecialists

Please note: All specialists should be pediatric specialists (i.e., fellowship-trained to practice in the pediatric version of their subspecialty). When appropriate, older adolescents and young adults may be referred to adult-oriented CCS-paneled providers, but a full array of pediatric specialists must be available for younger children.

- Nephrologist
- Neurologist
- Orthopedic surgeon
- Neurosurgeon
- Endocrinologist
- Oncologist
- Geneticist
- Metabolic geneticist (i.e., geneticist with special expertise in metabolic diseases)
- Craniofacial surgeon
- ENT/otorhinolaryngologist
- Physiatrist (i.e., physician specialist in Physical Medicine & Rehabilitation)
- Infectious Disease specialist, including special expertise in pediatric HIV/AIDS
- Immunologist
- Psychiatrist
- Ophthalmologist
- Cardiac/cardiothoracic surgeon
- Gynecologist
- Rheumatologist
- Plastic surgeon
- Transplant surgeon (with expertise in renal and hepatic transplantation at a minimum)
- Cochlear implant surgeon
- Anesthesiologist/pain management specialist
- Hematologist
- Neonatologist
- Perinatologist
- Vascular surgeon
- Pediatric intensivist.

2. Adequacy of Special Care Centers

In order to be considered adequate, a plan network must include at least one SCC in each SCC type currently approved by state CCS. See the attached list of Special Care Center types approved by the state.

3. Add new category:

**Specialized Medical Supplies**

Must be appropriate for infants and children and include child-appropriate catheters, feeding equipment, respiratory care equipment, and other special medical supplies

4. Professional, Allied and Medical Supportive Personnel

Add the following personnel categories (must be qualified to manage infants and children):

- Physical therapist
- Psychotherapist (e.g., clinical psychologist or LCSW)
- Feeding specialist
- Respiratory therapist

We very much appreciate this opportunity to provide comments on network adequacy as plans implement the Whole Child Model. Please let us know if you have any questions about our comments.

Sincerely,

CRISS Steering Committee

Katy Carlsen, MD, Medical Director, Placer County CCS
Terri Cowger Hill, Health Care Advocate, UCSF Benioff Children's Hospital Oakland
Arlene Cullum, Director, Women's and Children's Ambulatory Services, Sutter Medical Center
Louis Girling, MD, Medical Director, Alameda County CCS
Kausha King, Executive Director, CARE Parent Network
Lael Lambert, Administrator, Marin County CCS
Wendy Longwell, Parent Consultant, Rowell Family Empowerment of Northern California
Pip Marks, Project Director, Family Voices of California
Mira Morton, Director, Government Relations, California Children's Hospital Association
Laurie A. Soman, CRISS Director, Lucile Packard Children's Hospital
Meredith Wolfe, Administrator, Humboldt County CCS
Special Care Centers by Center Type

1. Amputee Centers
2. Bone Marrow Transplant Centers
3. Burn Centers
4. Cardiac Centers
5. Cleft Palate Centers
6. Cochlear Implant Centers
7. Communication Disorder Center (Type A)
8. Communication Disorder Center (Type B)
9. Communication Disorder Center (Type C)
10. Craniofacial Centers
11. Cystic Fibrosis and Pulmonary Disease Centers
12. Extracorporeal Membrane Oxygenation Centers, Neonatal (ECMO)
13. Gastrointestinal Centers
14. Heart and Lung Transplant Centers
15. Heart Transplant Centers
16. Hematology/Oncology Centers
17. Hemophilia Centers
18. High Risk Infant Follow-Up (Community)
19. High Risk Infant Follow-Up (Intermediate)
20. High Risk Infant Follow-Up (Regional)
21. Infectious Disease and Immunologic Disorders (IDID) Centers
22. Liver Transplant Centers
23. Metabolic and Endocrine Centers
24. Miscellaneous Centers
25. Neonatal Intensive Care Unit (Community)
26. Neonatal Intensive Care Unit (Intermediate)
27. Neonatal Intensive Care Unit (Regional)
28. Pediatric Intensive Care Unit
29. Prosthetics/Orthotics Centers
30. Rehabilitation Centers
31. Renal Dialysis and Transplant Centers
32. Rheumatology Disease Centers (See Miscellaneous Centers)
33. Selective Posterior Rhizotomy (SPR) Centers
34. Sickle Cell Disease Centers
35. Specified Inherited Neurological Diseases Centers
36. Spina Bifida Centers

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