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**VIA ELECTRONIC SUBMISSION: [EngAGE@aging.ca.gov](mailto:EngAGE@aging.ca.gov)**

February 10, 2020

Kim McCoy Wade, Director  
California Department of Aging  
1300 National Drive, Suite 200  
Sacramento, CA 95834-1992

**RE: SCAN Health Plan Comments on the California Master Plan on Aging**

Dear Ms. McCoy:

SCAN Health Plan (SCAN) appreciates the opportunity to offer comments on the California Master Plan on Aging (MPA) and applauds the State's commitment to improving services for older adults. We are pleased that SCAN Health Plan Board member, Jennie Chin Hansen, was selected as a member of the MPA Stakeholder Advisory Committee.

For over 40 years, SCAN has addressed the medical and social needs of older adults, providing high quality, integrated care to older adults in California. We have significant experience serving individuals who are dually eligible for Medicare and Medi-Cal benefits (referred to as "duals") as well as those who participate in the Multipurpose Senior Services Program (MSSP). Because of SCAN's long-time presence in California and experience with older adults, please let us know if we can be helpful in the development of the MPA. The following includes SCAN's issue statement, recommendations, and history of serving seniors in the State.

**I. SCAN Issue Statement**

More dual eligibles in California should have access to fully integrated care to meet their medical and social needs. As noted in the Governor's Executive Order (N-14-19), California's over 65 population is expected to increase to 8.6 million by 2030, an increase of four million people. Many of these individuals are likely to be ethnically diverse and have lower income.<sup>1</sup> To meet the health needs of this growing population, SCAN recommends expanding proven models in the state that provide high quality, comprehensive, integrated care for older adults who are dual eligibles to enable them to remain in their homes for as long as possible. Although the State has made significant progress in serving dual eligibles, more attention is needed to this population.

- **MPA Subcommittee:** Long-Term Services and Supports (LTSS)
- **MPA Framework Goal 1:** Services & Supports. We will live where we choose as we age and have the help we and our families need to do so.

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<sup>1</sup> Executive Order N-14-19, Executive Department, State of California. June 10, 2019. <https://www.gov.ca.gov/wp-content/uploads/2019/06/6.10.19-Master-Plan-for-Aging-EO.pdf>

- **MPA Framework Objective 1.1:** Californians will have access to the help we need to live in the homes and communities we choose.
- **Target Population and Numbers:** Low-income, older adults with complex care needs, especially those who are dually eligible. As of December 2018, there were over 1.4 million dual eligibles in California.<sup>2</sup>

## II. SCAN Recommendations

- **SCAN recommends that the State build on the success of the Fully Integrated Dual Eligible Special Needs Plan (FIDE-SNP) model as a key integration tool as well as other proven integrated models such as the Program of All-Inclusive Care for the Elderly (PACE).** We strongly support efforts to provide fully integrated health care, particularly with a focus on duals, of which we have the privilege to serve in our FIDE-SNP. SCAN operates the only FIDE-SNP in California, which integrates Medicare and Medi-Cal benefits, including LTSS, dental, and behavioral health. All of SCAN’s FIDE-SNP members receive high quality care, and are enrolled in plans with a 4.5 star rating from CMS. We believe that expanding the number of FIDE-SNPs in the state will significantly benefit dually eligible individuals.

In addition, older adults should have the option to receive care from plans that specialize in serving older populations. Seniors have different health issues and needs than other populations. Enrolling older adults into “one-size-fits-all” managed care plans may not be the best option for seniors or the State. As noted in the Executive Order establishing the MPA, “meaningful choice requires access to a broad range of public and private programs, resources, and supports, including health, homecare, food and nutrition, human services, housing and transportation.”<sup>3</sup>

### Evidence that Supports the Recommendation:

- *Evaluations of Integrated Care Models for Dually Eligible Beneficiaries: Key Findings and Research Gaps.*

<https://www.macpac.gov/wp-content/uploads/2019/07/Evaluations-of-Integrated-Care-Models-for-Dually-Eligible-Beneficiaries-Key-Findings-and-Research-Gaps.pdf>

- **Support MSSP Site Association MPA Recommendations.** As the largest MSSP site, SCAN supports the MSSP Site Association MPA recommendations. These include expanding the MSSP to meet rising immediate needs and incorporating MSSP services into the continuum of aging care including Medi-Cal Healthier California for All. Please see attached recommendations from the MSSP Site Association for additional details.

## III. SCAN Health Plan History in California

**SCAN has been at the forefront of providing innovative health care to vulnerable older adults in California for several decades.** SCAN (Senior Care Action Network) began in 1977 by 12 seniors in Long Beach, CA who were seeking more choice in their health care. With assistance from the University of Southern California, the group created a blueprint for a new and improved health care system by bringing

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<sup>2</sup> CMS MMCO Statistical & Analytic Reports. Monthly Enrollment Snapshots (national, state, & county) Retrieved on January 10, 2020 at: <https://www.cms.gov/Medicare-Medicaid-Coordination/Medicare-and-Medicaid-Coordination/Medicare-Medicaid-Coordination-Office/Analytics>

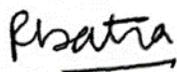
<sup>3</sup> Executive Order N-14-19, Executive Department, State of California. June 10, 2019. <https://www.gov.ca.gov/wp-content/uploads/2019/06/6.10.19-Master-Plan-for-Aging-EO.pdf>

together social service agencies and medical providers into an integrated, community-based organization. Since its inception, SCAN has served the needs of older adults in multiple ways, such as through the MSSP, Social Health Maintenance Organization (SHMO) demonstration, Special Needs Plans (SNPs), and Medicare Advantage Prescription Drug Plans (MA-PD).

- **MSSP.** In 1979, SCAN was selected to serve California's most at-risk seniors as one of eight MSSP sites. MSSP helps older Medi-Cal recipients stay out of nursing institutions as long as possible by providing home-based services to meet their specific needs. Today, SCAN's MSSP program is the largest site and serves 755 seniors at any time. Independence at Home (IAH), a SCAN community service program, administers our MSSP site as well as long-term and personal care coordination for low-income seniors and functionally-disabled adults.
- **SHMO/SNPs.** In 1985, Congress awarded SCAN one of four contracts to participate in the national SHMO demonstration project to address the clinical and non-clinical needs of older adults. The demonstration was extended multiple times and eventually evolved into the SNP model, which tailors membership to people with specific diseases/characteristics. In 2008, SCAN established its FIDE-SNP. (Please see attached summary of SCAN's FIDE-SNP.)
- **SCAN Today.** Over 200,000 Medicare beneficiaries are enrolled in SCAN's MA plans in California, making it the third largest non-profit MA-Prescription Drug plan in the country. We are the fastest-growing MA plan in our four core counties: Los Angeles, Orange, Riverside and San Bernardino. SCAN specializes in providing comprehensive, high quality care to the most vulnerable Medicare beneficiaries, including those who live with multiple chronic conditions; who are eligible for nursing home care; or who experience difficulty performing activities of daily living. SCAN is proud to have earned a 4.5 star rating on a five-point scale from the Centers for Medicare & Medicaid Services for three consecutive years: 2020, 2019, and 2018, and named one of the best insurance companies for MA in California by *U.S. News and World Report* for the second straight year.

SCAN truly appreciates your commitment to older Californians and vulnerable populations. Please do not hesitate to contact me at [rbatra@scanhealthplan.com](mailto:rbatra@scanhealthplan.com), if we can be a resource to you in any way.

Sincerely,



Romilla Batra, MD  
Chief Medical Officer  
SCAN Health Plan

Attachment: SCAN FIDE-SNP Summary; MSSP Site Association MPA Recommendation Form

cc: Jennie Chin Hansen