

March 17, 2023

Autumn Boylan, Deputy Director  
Office of Strategic Partnerships, Department of Health Care Services  
1501 Capitol Ave  
Sacramento, CA 95814

Amanda Levy, Deputy Director  
Health Policy and Stakeholder Relations, Department of Managed Health Care  
980 9th Street, Suite 500  
Sacramento, CA 95814

Dear Deputy Director Boylan and Levy:

The California Alliance of Child and Family Services, which represents over 160 community-based organizations (CBOs) serving children, youth and families through behavioral health, education, foster care, prevention and juvenile justice programs, has been deeply engaged in the school-linked fee schedule workgroup within the Children and Youth Behavioral Health Initiative. Our member agencies have long histories providing behavioral health services to students and families and understand the intricacies, opportunities and challenges of working within a school community. We respectfully submit the following recommendations and questions for your consideration:

- **Develop guiding principles and a clear strategy that will drive this workstream.** Due to the diversity of stakeholders and partners engaged in this work, it is imperative to build a shared understanding of the vision for the school-linked fee schedule. Guiding principles should be developed with the workgroup, using the following as a starting point:
  - ***Guiding principle: Prioritize maximizing providers who already serve students in schools.*** The most efficient way to build the behavioral health system's capacity to serve students is to support the providers who are already providing these services on school campuses. School districts should utilize existing networks and connections to CBOs that already have service delivery processes in place.
  - ***Guiding principle: Similar services, similar rates.*** The Alliance is concerned about potential misalignment between fee schedule rates and existing rates for services. It remains unclear what the relationship will be between rates developed under the fee schedule and rates developed under CalAIM payment reform. As previously suggested, a crosswalk between CYBHI rates and CalAIM rates for similar services would be immensely helpful. We are concerned that we are setting up a two-tier system with kids getting one set of services from the school-linked fee schedule, and potentially a different set of school-based services in EPSDT. Services and rates should be aligned across initiatives.

Further, we recommend the Departments communicate a defined strategy to execute the vision of increasing access to services and to establishing a sustainable funding source for school-linked behavioral health services.

- **Center CBOs as key partners in this work and incorporate their feedback in the development of the fee schedule.** Our behavioral health providers have expertise in the exact services the fee schedule targets, and a deep understanding of the process of establishing services on a school campus. For example, it is often complicated for community-based behavioral health providers to provide substance use disorder treatment services on campuses and there is great variety among district policies for

substance use services. Some school districts do not allow substance use disorder counselors on school campuses. The Departments should issue guidance regarding these services on campuses.

- **Support smaller districts who may not have the capacity to implement the school-linked fee schedule.** To ensure the equitable implementation, the Alliance recommends a targeted technical assistance plan to connect smaller districts with their behavioral health partners to support the delivery of school-linked services.

We appreciate the intention behind the school-linked fee schedule, and fully support the goal of increasing students' access to services. The Alliance and our members are eager to collaborate with the Departments to ensure the proposed reforms complement, rather than duplicate, existing initiatives.

We thank you for the opportunity to provide feedback. Please reach out to 916-639-4688 or [pclark@cacfs.org](mailto:pclark@cacfs.org) if you have any questions.

Sincerely,



Paige Clark  
Policy Advocate