



March 17, 2025

The Honorable Mia Bonta
Chair, Assembly Health Committee
1020 N Street, Suite 390
Sacramento, CA, 95814

Re: AB 315 (Bonta) – Support

Dear Chairwoman Bonta,

On behalf of All Home, I write in support of AB 315 (Bonta) which requires the Department of Health Care Services (DHCS) to expand capacity in the Medi-Cal Home and Community-Based Alternatives (HCBA) Waiver and to submit to the Legislature a study of rates and rate-setting methodologies for HCBA Waiver services.

All Home is a Bay Area organization working at the intersection of homelessness and poverty, and advancing policy solutions that increase the housing and economic security of people with extremely low incomes.

The HCBA Waiver is a Medi-Cal program that serves children, adults, and seniors with disabilities who qualify for an institutional level of care and need home and community-based services to live at home in the community. For decades, the HCBA Waiver has been the only option for community-based services for people with significant disabilities, including medically fragile children who do not qualify for Regional Center services. The HCBA Waiver is also particularly critical for people who need nursing care, and for people who need more than the maximum number of In-Home Supportive Services (IHSS) hours (283 per month). The HCBA Waiver enables people to truly receive 24-hour care in their homes and is a lifeline for seniors with disabilities like Alzheimer's disease and dementia, who often need more care than IHSS offers.

These services are showing particular promise in serving formerly homeless residents living in supportive housing, who need a higher level of medical care than typical housing programs provide. HCBA Waiver services are increasing housing retention for these residents, ensuring that the most medically vulnerable people are not cycling back into homelessness, while stabilizing PSH communities where they are being piloted.

Despite the critical role the HCBA Waiver plays in ensuring people with acute medical needs can remain in the community, in July of 2023 the Waiver reached capacity. While DHCS added additional slots for each year of the Waiver term (through 2027) as of November of 2024, there are 5,452 people on the waiting list. **At this rate, it will take years for a slot to become available for individuals currently on the waiting list, while new applicants will have to wait even longer.**

From a financial perspective, the HCBA Waiver saves California money: the average cost of HCBA Waiver services is \$53,397 per year while the average cost per year of a skilled nursing facility (SNF) for the HCBA Waiver population is \$134,292. The difference is striking—DHCS estimates \$110,726,000 in general fund savings from serving individuals through the HCBA Waiver rather than in skilled nursing facilities. The need to increase HCBA Waiver slots is also an equity issue; underfunding home and community-based services is particularly impactful for underserved communities of color. Lastly, the right to services which enable seniors and people with disabilities to lead full lives, on an equal basis with those living without disabilities, is undisputed, recognized by the Supreme Court's Olmstead decision, and California law.

AB 315 (Bonta) will help ensure Medi-Cal can serve all eligible individuals who want to enroll in the HCBA Waiver by requiring DHCS to seek federal approval to expand the number of enrollment slots in the HCBA Waiver to accommodate the current waiting list as well as the projected demand. The separate provision that requires DHCS to assess the adequacy and methodology of reimbursement for HCBA Waiver services will provide a solid evidence basis to inform future decisions about reimbursement methods and rates to ensure the availability of community-based providers.

Thank you for your attention to this matter and for your commitment to improve access to home-based care for all Californians.

Sincerely,

A handwritten signature in black ink, appearing to read "Brett Andrews". The signature is fluid and cursive, with the first name "Brett" being more prominent than the last name "Andrews".

Brett Andrews
Interim Chief Executive
All Home