



August 21, 2015

Honorable Edmund G. Brown
Governor of California
State Capitol
Sacramento, CA 95814

RE: AB 294 (Lackey and Steinorth): Health and Human Services Waiver
Transparency

Dear Governor Brown:

The California In-Home Supportive Service Consumer Alliance (CICA) respectfully urges you to sign Assembly Bill 294 which will increase transparency in departments under the California Health and Human Services Agency (CHHSA) by requiring that federally approved state plans and waivers be posted in an easily accessible location on their respective websites.

Currently, Department of Health Care Services (DHCS) provides an excellent model for waiver transparency as DHCS has a webpage devoted to Medi-Cal waivers which is clearly identified and easily accessible from a link on the department's homepage. This is a model AB 294 hopes to emulate for other CHHSA departments.

On websites for other departments within CHHSA, it is very difficult to find approved waivers or state plan—if they are posted at all. Many are buried on pages that are not labeled as containing waiver information or require visiting multiple pages before they can be located.

Improving waiver and state plan transparency is important because we have seen issues in the past arise when information on waivers is not readily available to the public. Recently, advocates learned of an “early

denial waiver” which allowed applicants for the Supplemental Nutritional Assistance Program (SNAP) to be denied for failing to provide income verification within 10 days—30 days are required without the waiver. When the existence of the early denial waiver came to light, many in the public were surprised because they were unaware California had been granted it.

This type of issue can be avoided if waivers and state plans are easy for the public to find and access online. Providing online access is also much less expensive for agencies than having to respond to public information requests.

While CHHSA does have discretion to institute an agency policy on this issue, AB 294 offers an opportunity to establish a critical policy for future administrations by requiring CHHSA departments to post federally approved waivers and state plans on prominent locations on their websites. Government functions best when its policies are open and transparent to the public. I strongly believe AB 294 helps take California towards this laudable goal. Again, for these reasons California In-Home Supportive Service Consumer Alliance supports AB 294 and respectfully requests your signature.

Sincerely,

Charles Bean

CHARLES BEAN
Executive Director

cc: The Honorable Tom Lackey
Spencer Rhoads, Legislative Aid, Office of Tom Lackey
Donna Campbell, Office of the Governor
Kevin Aslanian, CCWRO