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Proposed Attorneys for the Chapter 11 Debtor and Debtor In Possession

**UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF CALIFORNIA**

In re

BORREGO COMMUNITY HEALTH
 FOUNDATION, a California nonprofit public
 benefit corporation,

Debtor and Debtor in Possession.

BORREGO COMMUNITY HEALTH
 FOUNDATION, a California nonprofit public
 benefit corporation,

Plaintiff,

v.

CALIFORNIA DEPARTMENT OF HEALTH
 CARE SERVICES,

Defendant.

Case No. 22-02384-11

Chapter 11 Case

Adv. Pro. No. 22-90056

**SUPPLEMENTAL DECLARATIONS IN
 SUPPORT OF EMERGENCY MOTION: (I)
 TO ENFORCE THE AUTOMATIC STAY
 PURSUANT TO 11 U.S.C. § 362; OR,
 ALTERNATIVELY (II) FOR TEMPORARY
 RESTRAINING ORDER**

DENTONS US LLP
 601 SOUTH FIGUEROA STREET, SUITE 2500
 LOS ANGELES, CALIFORNIA 90017-5704
 (213) 623-9300



2202384220928000000000002

DECLARATION OF ANTONIA D'ORSAY, PHD, MS, MA

I, Antonia D'orsay, declare as follows:

1. I am the Director of Trans Services at Borrego Community Health Foundation ("Borrego"). The facts stated herein are personally known to me, and if called as a witness I could and would competently testify to them.

2. I make this declaration in support of Borrego's request for a temporary restraining order enjoining the Department of Health Care Services from implementing a suspension of Medi-Cal payments to Borrego for services rendered to Medi-Cal patients.

3. I have dedicated my career to addressing the issues of Diversity, Equity, Equality, and Inclusion of trans and gender diverse persons. I have spent the last 17 years promoting and creating accessible and safe environments for LGBTQ+ individuals. I received my Masters of Arts degree in sociology from the University of Arizona in 1989, my Masters of Science degree in psychology from the University of Arizona in 1991, and my PhD in Sociology in 1994.

4. I joined Borrego in March of 2018. Prior to joining Borrego, I was the Executive Director of This Is H.O.W., a nonprofit community based organization in Phoenix, Arizona dedicated to serving the trans and gender diverse community with housing, support, political and social advocacy, and education of medical and behavioral health providers. In addition, I have worked with the White House, the United Nations, local Counties and Universities, and I am the current Advocate of the Year for Greater Palm Springs Pride.

5. My role as Director of Trans Services at Borrego includes development, implementation, direction, and administration around cultural competence, practice guidelines, at risk and marginalized community outreach and education, youth and adult services, community base education, development, and training, and some 50 elements relating to not only internal but regional program development, guidance, education, and strategic planning, making me one of the leading figures in the region in relation to the needs of the transgender population. For convenience, a true and correct copy of my job description is attached as Exhibit A.

6. When I first started working at Borrego, there was only one group in both Riverside and San Bernardino providing care for Trans people: Kaiser Permanente. There was some limited

1 coverage, but none addressed the specific needs of trans youth, the unique challenges of trans
2 people of color, or the trans migrant worker population. In essence, there was an absence of
3 healthcare providers that offered services and programs to effectively address the diverse needs of
4 Riverside and San Bernardino counties' transgender and gender diverse population.

5 7. Through my role at Borrego, I have built a program that has been recognized by
6 peers in Trans Medicine from the World Professional Association of Transgender Health
7 ("WPATH"), has built a system to enable care for trans youth, and that continues to build and
8 develop tools, resources, and collaborations throughout the region. Through this system Borrego is
9 doing what no other provider in the area is – sending people out into the community to educate
10 and improve coverage within its own system.

11 8. In addition to developing a significant internal infrastructure to address the diverse
12 needs of the area, Borrego also provides training to other providers in the area, as well as to the
13 District Attorney's office of San Bernardino to provide improved coverage for trans people
14 throughout the Inland Empire Health Plan ("IEHP").

15 9. Borrego's leadership has over 60 years of combined experience and a combined
16 direct service experience level of over 30,000 individuals – making Borrego the most experienced
17 and knowledgeable provider in the region. Without Borrego, there would be an undue burden on
18 other providers who do not have the ability to ramp up to address the significant services Borrego
19 provides.

20 10. To impose a Medi-Cal suspension on Borrego would hinder the affirmative steps
21 taken to improve coverage to trans people through the IEHP, strip the ability of trans youth to get
22 treatment within the counties Borrego serves, and would significantly disrupt a growing and
23 expanding service set that has no parallel. Borrego established a forefront model that shows that
24 routine care of trans people is not disruptive or overly expensive, which has often limited other
25 providers willingness to provide such services.

26 11. The larger impact of removing Borrego as a provider option can be seen in recent
27 examples where Borrego previously had to close clinics in Barstow and San Bernardino. These
28 closures alone caused anxiety and uncertainty in the community. After such closures, the trans

1 patient population was left in the care of an alternative agency which is known in the community
2 to use improper names and pronouns when addressing trans and gender diverse patients.
3 Significant data and research indicate that using trans individuals' "dead names," misgendering,
4 and using incorrect pronouns has a significant impact on the mental health of such patients.

5 12. The recent partial transfer of patients to Neighborhood Healthcare is also indicative
6 of Borrego's needed presence in the community. Recently, several patients who were previously
7 part of Borrego's Eastside A and B and Arlanza clinics were transferred out of Borrego to a
8 neighboring provider. After this transfer, we received a significant influx of calls from patients and
9 their families indicating that this neighboring provider lacked the same infrastructure as Borrego
10 to provide comprehensive care for trans patients. Patients indicated to me that they felt there was a
11 lack of familiarity with how to treat and address trans patients, and a lack of institutionalized
12 knowledge regarding trans healthcare. The stress and anxiety experienced by patients transferred
13 without their consent is understood as "transfer trauma" and has a significant impact on patients'
14 mental health and wellbeing. I later spoke to leadership at the neighboring provider, who indicated
15 to me it would likely take 6 months to establish the systems needed to provide necessary care to
16 the transferred patients. Trans individuals generally need to meet with their physicians every 3
17 months. Several of these patients requested to be transferred back to Borrego, however, due to the
18 potential suspension, we have been unable to reintegrate this patient population.

19 13. Additionally of importance, on September 15, 2022, the International Journal of
20 Transgender Health published version 8 of the Standards of Care for the Health of Transgender
21 and Gender Diverse People. I am considered the local point person for that document, as I assisted
22 in drafting the prior versions of the standards. Senate Bill 923, the Gender Affirming Care bill, is
23 also currently awaiting the Governor's signature and is fully expected to pass. With the passage of
24 this new bill and the revised standards, other agencies in the area will need to rely on Borrego,
25 who is the only provider in the region which already has the institutional knowledge and
26 infrastructure, to comply with the new and revised care standards.

27 14. Borrego's programs and efforts to engage the trans, gender diverse, and LGBTQ+
28 community make it a one-of-a-kind service provider in the region. The only two other providers

1 even close – Children’s Hospital Los Angeles, and Rady Children’s Hospital in San Diego, both
2 require several hours of travel each way and have significant wait times for entry. Meaning that
3 without Borrego’s programs, trans youth in the community will not receive access to necessary
4 medical care, including obtaining suppression agents and regular check-ups. I believe that
5 cessation of access to Borrego’s program and its accessible medical care also creates a significant
6 risk of self harm to the community and will likely instill a continuation of the distrust of medicine
7 that has marked all trans people’s lives in the United States since 1958.

8 15. There is no adequate substitute in the region for the trans youth to receive care. For
9 example, the Riverside University Health System (“RUHS”) will not see any trans individual
10 under the age of 18. RUHS’ health services to the trans community are largely focused on surgery
11 rather than a holistic care approach, and as such, RUHS’ has not yet established the infrastructure
12 to provide comprehensive care to the trans community in the region. Further, only RUHS patients
13 can seek care from RUHS, which limits access to care provided in the community.

14 16. Another provider option, DAP, only has a single care provider who has the
15 requisite experience in offering healthcare serves to trans individuals, but the provider is unable to
16 see trans patients under the age of 16.

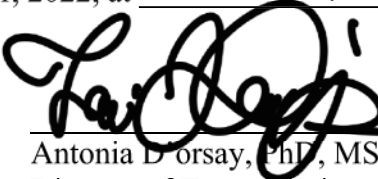
17 17. For trans youth in the region, Borrego is the only resource available that does not
18 require children and their parents to travel several hours each way to obtain essential care. Borrego
19 is the only provider in the region that offers care to trans youth from the ages of 9-16.

20 18. Several patients in our region have come forward and informed me that other
21 providers in the region have expressed that they will not provide care to them expressly because
22 they are trans. Should the suspension go into place, an entire community will be without access to
23 physicals, screenings, mental health counseling, PrEP usage, surgeries, and hormone therapies.

24 19. The team at Borrego has taken affirmative action over the past 5 years to fight
25 against the stigmatization and bias that is normative within the entire region. Borrego regularly
26 serves anywhere from 600 to 1,500 trans patients in the region. Over the last year alone, Borrego
27 has treated approximately 900 trans patients. Without Borrego, these patients have no alternative
28 places to seek medical care that addresses their needs.


1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed on this 23rd day of September, 2022, at Desert Hot Springs, California.

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6 Antonia D'orsay, PhD, MS, MA
7 Director of Trans Services, Borrego Health
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EXHIBIT A

	EFFECTIVE DATE: Date Approved	POLICY N°: Assigned by approver
	REVISION DATE: 03/18/2021	
	ORIGINATOR: Human Resources Department	LOCATION: ALL SITES
SUBJECT: JOB DESCRIPTION – DIRECTOR OF TRANS SERVICES		

Status: Exempt

Reports to: Corporate Chief Operating Officer

Direct Reports: Trans Community Health Manager

Summary:

Under the supervision of the Corporate Chief Operating Officer, the Director of Trans Services is responsible for the development, coordination, facilitation, and implementation of specialty health programs for Borrego Health staff and community partners, with a focus on transgender, underserved, at-risk and other high-need communities. The Director of Trans Services develops, coordinates, and facilitates policy, planning, implementation and outreach in a best practices environment.

Essential Duties and Responsibilities:

Administrative Functions:

1. Develops, maintains and revises current educational programs, including but not limited to transgender services, cultural competence, and educational outreach for at-risk and underserved populations
2. Seeks and establishes programs to acquire grants, grant writing and related funding, with a focus on at-risk and underserved communities
3. Develops, coordinates, presents, and facilitates, in collaboration with internal and external colleagues, cultural competency meetings as required, and participates on committees as directed
4. Collaborates with outside agencies (such as Fenway Institute) to address cultural competency and develops policies and interventions within the Borrego Health system
5. Identifies, develops, and coordinates transgender cultural competency activities within the Borrego Health system
6. Provides direct counseling, in person and remotely, relating to policy and practices in treatment of trans and Transgender patients by program staff and volunteers
7. Coordinates with local leaders and community members to assess and develop specialty guidelines and programs for the Borrego Health system
8. Works with the Corporate Chief Operating Officer and the Director of Transgender Medicine to develop, revise, and implement trans-competent policies, programs, outreach and intra-system algorithms for best practices that are based upon nationally recognized guidelines
9. Identifies and builds initiatives for Borrego Health for transgender / HIV / and other at-risk populations.
10. Works alongside the specialty department to identify at-risk communities and their needs and coordinates linkage to services and care.
11. Identifies and maintains a relationship with advocacy agencies (e.g., Human Rights Campaign) and other venues whom have a focus on those that serve hard-to-reach or disparately impacted transgender persons, specifically rural, persons of color, elderly, veterans, and disabled sub-communities.
12. Maintains professional competency in prevention services, national organizations' policies, and best practices.
13. Develops, establishes, and improves relationships with national organizations and providers to ensure the continued use of and development of best practices, to include attendance at functions and presentations relating to Borrego Health through outreach efforts and continued education.
14. Establishes, develops, and supervises a digital media outreach program focused on health initiatives, alongside the marketing department.

SUBJECT: JOB DESCRIPTION – DIRECTOR OF TRANS SERVICES

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15. Reviews and makes recommendations on current trends in the local and state health and well-being policies as described in the current WPATH SoC.
16. Disseminates updated policies and current practices across all Borrego departments.
17. Provides patient advocacy and resource navigation that includes creating and keeping an internal network of patient needs and satisfaction and interpreting data collected in order to create better practices.
18. Other duties as assigned.

Clinical Functions:

1. Provides quality care to the patients of Borrego Health, within the scope of practice outlined by state or federal law.
2. Delivers care in accordance with established standard of care and accepted community standards.
3. Understands the organizations commitment to provide high quality patient care. Promotes a Patient centered environment.

Staff Supervision:

1. Supervises Trans Community Health Manager on site and remotely to ensure programmatic materials and procedures meet standards of the Department.
2. Works with the SPDS to develop the Peer Support and Navigator Training methodology
3. Provides staff training as necessary and ensures compliance with new employee and annual training requirements.
4. Evaluates staff performance either directly or in collaboration with co-management.
5. Conducts employee corrective action, provides guidance and conducts annual evaluations.
6. Responsible for ensuring staff compliance with all Borrego Health policies and procedures, and all applicable laws and regulations, including HIPAA and OSHA.

Strategic:

1. Establishes, oversees and executes vision, goals and objectives for department that are in alignment with organizational strategic plan.
2. Communicates vision, goals and objectives within own departments and with other departments, including regular department updates regarding current activities.
3. Develops, cultivates and maintains future leaders of the organization and empowers them to lead and succeed.
4. Maintains awareness of job responsibilities, challenges, barriers and needs within reporting line.
5. Monitors department progress and maintains accountability, recommending, and participating in department and/or personnel evaluation and improvement efforts as necessary.
6. Effectively collaborates with other departments to work toward shared goals and common vision
7. Maintains awareness of how department fits into the bigger organizational picture
8. Maintains knowledge of regulatory and oversight requirements and ensures compliance

Program:

1. Maintains awareness of direct report's systems and processes, and participates in process improvement initiatives, as necessary.
2. Representative of Borrego Health internally and externally
3. Presents and pursues opportunities for further organizational development and growth
4. Acknowledges role in productivity and quality improvement
5. Ensures development and maintenance of department policies and procedures, and adheres to appropriate organization-wide implementation processes

Financial:

1. Develops department-level budgets that adequately balance the financial needs of the departments against the needs for fiscal responsibility.

SUBJECT: JOB DESCRIPTION – DIRECTOR OF TRANS SERVICES

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Service:

1. Actively supports, promotes, and works to fulfill the Mission, Vision and core values of Borrego Health.
2. Embodies Borrego Health's core values- Accountability, Compassion, Integrity, Respect, Commitment, Loyalty and Excellence.
3. Provides excellent internal and external customer service.
4. Demonstrates Borrego Health's Standards of Customer Service Behavior: Compassion, Attitude, Communication, Appearance, Sense of Ownership, and Teamwork.
5. Participates in on-going customer service trainings.
6. In every action, seeks to promote Borrego Health as a top service organization.
7. Contributes to the success of the organization by participating in quality improvement activities.
8. Complies with all Borrego Health policies and procedures and proactively participates in the implementation of new initiatives

Safety:

1. Ensures compliance with policies and procedures related to safe work practices.
2. Uses all appropriate equipment and/or tools to ensure workplace safety.
3. Immediately reports unsafe working conditions.

Privacy/Compliance:

1. Maintains privacy and security of all patient, employee, and volunteer information and access to such information. Such information is accessed on a need to know basis for business purposes only.
2. Complies with all regulations regarding corporate integrity and security obligations. Reports unethical, fraudulent or unlawful behavior or activity.
3. Upholds strict ethical standards

Qualifications:

Minimum Qualifications:

1. All staff that is presently working within a clinic is required to have a Current and Valid CPR and First Aide certification on file with the Human Resources Department. This is for clinical and administrative staff. This new license requirement is mandatory for continued employment, CPR and First Aide certification must be obtained through the American Heart Association. Internet certificates do not comply and for this reason are not valid.
2. Minimum five years of work experience with transgender persons.
3. Supervisory and project coordination experience required
4. Strong understanding of and interest in transgender and LGBT health issues
5. Strong interpersonal communication skills
6. Strong ability to manage challenging situations with utmost professionalism, care and discretion
7. Ability to provide precise, well-written documentation
8. Experience providing HIV education, PEP and PrEP testing and counseling a plus
9. Demonstrated computer skills (Microsoft Outlook, Word, PowerPoint, and Excel)
10. Ability to handle multiple tasks and prioritize assigned duties
11. Ability to work independently and in small groups
12. Experience working in an ethnically, culturally, and racially diverse environments preferred
13. Ability to meet deadlines and work within a team-based environment
14. Bachelor's degree or greater in social work, healthcare administration, psychology, or sociology preferred and/or 5 years of equivalent experience

Special Conditions of Employment:

1. Driver's license requirements Class C no moving violations within 5 years.

SUBJECT: JOB DESCRIPTION – DIRECTOR OF TRANS SERVICES

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Knowledge, Skills and Abilities:

1. Excellent oral and written communication skills.
2. Effective interpersonal skills.

Physical and Mental Requirements:

1. Able to lift/move up to 20 pounds, move from place to place, and stand for long periods of time
2. Ability to do math, organize and prioritize workload, work effectively and efficiently under stress
3. Ability to supervise, multitask, understand and follow instructions
4. Ability to proficiently read, write, speak and understand English

Flexibility: Available for all shifts and, when required, able to work evenings and weekends.

Acknowledgement

Borrego Health is an Equal Opportunity Employer. We encourage applications from all individuals regardless of race, religion, color, sex, pregnancy, national origin, sexual orientation, gender identity, gender expression, ancestry, age, marital status, physical or mental disability or any other protected class, political affiliation or belief.

I acknowledge that I have read and understand the attached job description. My signature below certifies that I am able to perform the essential duties and responsibilities of this position. I have also discussed any accommodations that I feel I might need to allow me to perform these essential functions. I agree to abide by all policies and procedures of Borrego Health.

Print Name: _____

Location: _____

Signature: _____

Date: _____

DECLARATION OF AMANDA DASHIELL

I, Amanda Dashiell, declare as follows:

1. I previously worked in the capacity of clinic manager for Borrego Community Health Foundation ("Borrego") in Barstow, California. The facts stated herein are personally known to me, and if called as a witness I could and would competently testify to them.

2. When the Barstow Community Health Center ("Barstow Health Center") opened, I worked for the local hospital. The clinic was welcomed to the community, because it filled a great need in the Barstow area.

3. Borrego, unlike other providers in the community, was able to treat Medi-Cal patients. In short, this meant a previously underserved population of patients in the community were able to seek and receive medical care for the first time in years, if not decades. Borrego was able to partner with the hospital and offer services to the patients that were repeatedly seeking care at the hospital rather than seeing a primary care provider. Barstow Health Center was able to reduce the burdens placed on the local hospital and its emergency room by redirecting patients and providing them with direct care. More importantly, Barstow Health Center was able to address the needs of patients suffering from chronic illnesses that required more holistic care. Specifically, Barstow Health Center was able to provide educational outreach to patients regarding diet and exercise, provide necessary referrals to specialists, including behavioral health providers, and assist patients in finding and obtaining necessary substance abuse treatment.

4. When we announced that Barstow Health Center would close earlier this year, we received significant feedback from both patients and the greater the community. I was informed that many residents of Barstow and the outlying areas would no longer have the opportunity to seek medical care close to home, and would therefore be unable to receive medical care due to a lack of access to transportation. I received additional feedback that patients were being told by other local providers that several local providers were unwilling to provide those patients with healthcare services and as a result, many patients were unable to obtain referrals to specialists.

5. It has been about 7 months since Barstow Health Center closed. Despite this time, I continue to receive feedback from the community about how disappointed they are that Barstow

1 Health Center left the community and how much Barstow needed, and continues to need, the
2 services Barstow Health Center previously provided. Most individuals that contact me express
3 hope that someday Barstow Health Center will return to the community and there has been
4 significant feedback that indicates the Barstow population would gladly welcome Barstow Health
5 Center back.

6 6. Barstow Health Center met a need for the patients that has been left unfulfilled,
7 despite the opening of another FQHC in the area. I believe that if the Medi-Cal suspension goes
8 into effect, this will unfortunately leave other rural communities with a similar lack of access to
9 medical care.

10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct.

12 Executed on this 23 day of September, 2022, at Helendale, California.

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14 Amanda Dashiell
15 AMANDA DASHIELL
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DECLARATION OF CYNTHIA BAINBRIDGE

I, Cynthia Bainbridge, declare as follows:

1. I am the manager of Borrego Medical Clinic, located in Borrego Springs, California. The facts stated herein are personally known to me, and if called as a witness I could and would competently testify to them.

2. The Borrego Medical Clinic is part of the Borrego Community Health Foundation ("Borrego Health"). I feel that it is important to share my concerns with DHCS regarding the suspension of Medi-Cal payments for Borrego Health.

3. According to Google, Borrego Springs' population is 1,864. Our clinic is extremely rural. Our population is unique in that we serve many underserved patients, including families, seniors and veterans. The people in Borrego Springs reside in San Diego County in an area known as the backcountry.

4. There only healthcare services in Borrego Springs are the Borrego Medical Clinic, Borrego Pharmacy and Woolcott Dental which are all Borrego Health facilities. If Borrego Health is unable to keep their doors open, these people have nowhere to get any health care. The closest community health center is over 50 miles away. There is no public transportation with exception of a rural mountain bus that leaves Borrego Springs at 2:30 p.m. only on Fridays.

5. The community has always relied on the Borrego Medical Clinic to provide services. During the pandemic, we assisted many patients with vaccines and testing and we continue to offer those services. We provide mobile mammography, behavioral health services through telehealth, primary care, and OB/GYN care. The Borrego Pharmacy is able to fill prescriptions and provide in-person consults for patients needing medication education.

6. Our mission is focused on serving the underserved; and we hope we will continue to do so. However, without Borrego Health if it is suspended from Medi-Cal, due to the geographic isolation, many of our patients would be completely disconnected from care.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 23 day of September, 2022, at Borrego Springs, California.


CYNTHIA BAINBRIDGE

DECLARATION OF JENNA LECOMTE-HINELY, PhD

I, Jenna LeComte-Hinely, declare as follows:

1. I am the Chief Executive Officer (“CEO”) of HARC, Inc. (Health Assessment and Research for Communities). I also volunteer as the Secretary of the Board of Trustees for Borrego Community Health Foundation (“Borrego Health”). The facts stated herein are personally known to me, and if called as a witness I could and would competently testify to them.

2. I was drawn to volunteer for Borrego Health because of the work it does to provide culturally competent care to underserved communities that would otherwise lack access to care.

3. Borrego Health’s staff are intimately familiar with the unique needs of their patient population, and provide critically important, culturally competent care to meet those unique needs.

4. For example, Borrego Health serves many transgender patients and even has transgender patient advocates on staff to assist with their unique healthcare needs.

5. Borrego Health has also become a trusted care provider for the migrant farmworker community thanks to Borrego Health’s outreach efforts and efforts to meet the workers where they live and work to ensure they receive the care they need.

6. During the pandemic, Borrego Health ran COVID-19 testing sites that started at dawn and were located at the gas station on the farmworkers’ route to the fields in order to make COVID-19 tests accessible to the farmworkers. Borrego Health even offered drive-through testing for those riding on tractors and combines.

7. In sum, Borrego Health provides culturally competent care to numerous hard-to-reach populations, including undocumented immigrants, people living with HIV/AIDS, and many other underrepresented groups.

8. I am deeply concerned about the harm that will befall Borrego Health’s patients if Borrego Health is forced to close. Having lived and worked in the communities Borrego Health serves, I know that there are simply no alternative providers to care for many of these patients.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed on this 26th day of September, 2022, at Indio, California.

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6 JENNA LECOMTE-HINELY, PhD
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DECLARATION OF

I, [REDACTED] declare as follows:

1. I am an individual and a patient of **Centro Medico Coachella of Borrego Health**.

I have been a patient of **CMC** since **October 2016**. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. I make this declaration in support of Borrego Community Health Foundation's request for a temporary restraining order enjoining the Department of Health Care Services from implementing a suspension of Medi-Cal/Denti-Cal payments to Borrego Community Health Foundation for services rendered to Medi-Cal/Denti-Cal patients.

3. I am a resident of the city of Coachella, California.

4. [REDACTED] are Medi-Cal beneficiaries.

5. I was notified that the Department of Health Care Services intends to issue a Medi-Cal suspension to Borrego Community Health Foundation beginning September 29, 2022.

6. If the suspension goes into effect, I am worried my family, [REDACTED] will:

- Have to travel another city such as Indio to see our medical providers and to get routine medical services
- Would be unable to travel to another provider due to limited transportation
- Have to wait 3 months until I can see a receive treatment
- Will not be able to receive adequate health care services.
- Will have to pay more for traveling cost, gas.
- Would have to see a provider that is less equipped at addressing my needs

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 22 day of September, 2022, at Coachella, California.



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DECLARATION OF

I, [REDACTED], declare as follows:

1. I am an individual and a patient of _Borrego Health Community Foundation_. I have been a patient of ___Borrego Health Community Foundation since ___May 2nd_____, 2011_. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. I make this declaration in support of Borrego Community Health Foundation's request for a temporary restraining order enjoining the Department of Health Care Services from implementing a suspension of Medi-Cal/Denti-Cal payments to Borrego Community Health Foundation for services rendered to Medi-Cal/Denti-Cal patients.

3. I am a resident of the city of ___Vista_, California.

4. [REDACTED] are children are Medi-Cal beneficiaries.

5. I was notified that the Department of Health Care Services intends to issue a Medi-Cal suspension to Borrego Community Health Foundation beginning September 29, 2022.

6. If the suspension goes into effect, I am worried that I and my family members will:

- Have to travel to Oceanside or Bonsail see our medical providers and to get routine medical services
- Would be unable to travel to another provider due to limited transportation
- Have to wait for unknown amount of time until I can see a new doctor receive treatment
- Will not be able to receive the different services we receive at Borrego Heath
- Will have to pay more for transportation and other services
- Would have to see a provider that is less equipped at addressing my needs

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this __23rd__ day of September, 2022, at _____2:50 PM_____, California.

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