



policy: the essential investment

June 2015



Putnam Consulting Group

Confident Giving • Dramatic Return

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table of contents

understanding the opportunity for policy engagement	3
BSCF's place in the policy spectrum	5
creating an environment for policy ideas and discussion	6
advocacy at arm's length	9
supporting policy implementation	10
honing in: California's early Medicaid expansion	11
investment results are cumulative and interrelated	12
challenges and lessons learned	13
what's next?	17

The mission of Blue Shield of California Foundation is to improve the lives of all Californians, particularly the underserved, by making health care accessible, effective, and affordable, and by ending domestic violence. Since 2002, the Foundation has awarded more than \$300 million in grants throughout the state.

**policy:
one piece of
the puzzle**

Supporting the creation of supportive public policy is important, but more is needed to create long-term change. BSCF's 2013-16 strategic plan includes an organizational logic model that incorporates four interconnected strategies:

- Adaptive leadership
- Capacity building
- Innovation
- Policy

policy: the essential investment

Blue Shield of California Foundation (BSCF) embraces a clear mission for its work: to ensure access to affordable and effective health care for vulnerable populations and to end domestic violence. Since its dramatic expansion in size and scope in 2002, BSCF has played a role in informing the questions and conversations that shape California's public policy for its two target fields. While the Foundation does not engage in lobbying or endorse specific legislation, it recognizes that contributing to the informed dialog about public policy directly affects the environments in which grantees operate in each of its fields of focus and therefore is an integral part of its work. In 2013, the Foundation made policy work one of four cornerstones of its strategic plan, along with leadership development, capacity building and innovation. It also has increased its financial investment in policy work significantly in recent years and has integrated a focus on policy change more deeply into its grantmaking.

understanding the opportunity for policy engagement

Foundations have a unique role to play in the creation, adoption and implementation of public policy. Whereas nonprofits must necessarily bring a lens of self-interest to their policy work as a means of survival, foundations are able to take a longer, broader view and inform policy discussions in a more objective manner. They can commission research, disseminate findings, convene a broad range of stakeholders, focus conversations and evaluate the effects of policy on the public. Indeed, foundations can play a critical role in this way, building trust and consensus among advocates and governments without pushing a specific legislative agenda.

This is especially important for a foundation like BSCF, which focuses intently on elevating the performance not just of the nonprofits it supports but also of the entire healthcare safety net and domestic violence fields in California. Through its work to support capacity building, leadership development and innovation, BSCF has invested millions in systems change to help both fields to survive and thrive in the twenty-first century. Policy change is an essential element to that systems change. "Policy is core to our impact equation," says BSCF President and CEO Peter Long. "We believe there is some element of policy in everything we are trying to do."

In 2007, the Foundation began to wade deeper into the policy spectrum by funding California Speaks, a broad outreach effort that engaged 3,500 randomly selected Californians across eight counties in discussions about healthcare reform. Although California Speaks was meant to

"If you do health care and you don't do health policy, you're missing important pieces of the puzzle."

Peter V. Long, Ph.D.,
President & CEO,
Blue Shield of California
Foundation

inform then-Governor Schwarzenegger's attempt at statewide health insurance reform (which subsequently failed), it helped BSCF begin to fully understand the potential value of informed and far-reaching policy conversations in shaping the environment for health care — the environment that ultimately affects the Foundation's ability to achieve its mission.

Over the years, the Foundation has engaged in a number of health policy activities related to the implementation of the Affordable Care Act (ACA) and California's early Medicaid expansion as well as the creation of fledgling policy discussions in the domestic violence field. BSCF's investment in policy has grown from 5 to 10 percent of its annual grantmaking budget to nearly 40 percent, especially in terms of health care. Staff conversations regularly address the implications of policy in everything BSCF attempts and help determine the approaches the Foundation employs to achieve its mission.

Throughout its engagement in the policy arena, BSCF has rarely worked alone. Other California foundations, including The California HealthCare Foundation and The California Endowment, have each taken a role in helping shape the state's healthcare policies, and BSCF has frequently worked in collaboration with one or all of them. In addition, BSCF has worked with statewide associations including the California Primary Care Association, the California Association of Public Hospitals and Health Systems, the California Partnership to End Domestic Violence and others. These collaborations have been crucial, since the collective voice of statewide funders and advocates within a policy discussion can create a broader platform of participation and a more widely accepted common agenda than can a single foundation acting alone.

While the Foundation has engaged in policy work within the healthcare safety net for years, its foray into policy support for the domestic violence field is relatively new. Interest in deeper engagement on policy related to domestic violence has been driven in recent years by threats to state funding for the field and the development of new strategies to address the needs of survivors. BSCF looks forward to applying proven policy strategies and innovative policy approaches to enhance the systems change in this field.

BSCF's place in the policy spectrum

In 1984, researcher John Kingdon proposed the idea of a “policy window” — a phenomenon that occurs when problems, policy proposals and politics all converge to create an environment in which a policy is introduced into legislative discussion, whether or not it becomes law.¹ This policy window is the dominant frame for many foundation discussions of policy advocacy, and it focuses on what foundations can do — within the law — to help promising policies gain the traction and support they need for passage.

As a corporate foundation with a parent company rooted in health care, the Foundation has provided very limited support for advocacy efforts while health policies are under consideration by the state legislature. The Foundation maintains a focus on informing conversations and convening discussion without supplying endorsement or taking sides in legislative debate.

Policy legislation is a small time frame in terms of policy development and implementation. There is groundwork that happens years in advance of the policy window opening for specific action, and there are numerous decisions to be made after a policy becomes law.

For its policy work, BSCF has chosen to focus most of its effort in these two areas — the “before” and “after” that occur on either side of legislative activity, where the environment is created for policy development and where the implementation of policy becomes a reality across California.

spectrum of policy engagement



¹Kingdon, John W. (1995) *Agendas, Alternatives, and Public Policies*. Second edition. New York: Harper Collins.

creating an environment for policy ideas and discussion

For policy to ever come to fruition, there must first be fertile ground in which it can take root. BSCF focuses on providing the resources that create that fertile ground, where ideas can be shared and developed among a broad range of stakeholders. Those resources include:

informing a broader perspective

Because of its statewide scope and its deep knowledge of the healthcare safety net and domestic violence fields, BSCF is able to maintain a broad view as it considers areas in which policy change might play a key role. As the Foundation gathers information from across the field, it also can find where differences of opinion are manifest, listen without judgment and eventually help those with disparate opinions find common ground. This broad view helps inform the agenda for early policy discussions and feeds conversations about what potential policy solutions might look like.

research

As part of helping to inform a broader perspective, BSCF has contributed to considerable research on various areas of policy discussion over the last decade. The Foundation has supported research projects that cover a range of policy-related topics, including:

- Projections about the numbers of Californians who would gain or switch insurance coverage under the ACA ("The Impact on California of the Affordable Care Act," *Health Affairs*, January 2011).
- An in-depth evaluation of the Low Income Health Program (Interim Evaluation Report on California's Low Income Health Program [LIHP], UCLA Center for Health Policy Research, July 2013).
- Gaps in ACA coverage for California children protected under the federal Deferred Action for Childhood Arrivals immigration policy (Realizing the Dream for Californians Eligible for Deferred Action for Childhood Arrivals: Demographics and Health Care Coverage, UC Berkeley Labor Center, UCSF Philip R. Lee Institute for Health Policy Studies, UCLA Center for Health Policy Research, February 2014).

supporting a robust discussion and process

Ideally, all public policy would be created with broad participation from informed representatives of organizations active in the field. However, despite good intentions, government often faces the challenges of limited time and budget for outreach and engagement—and must juggle competing demands that prevent it from developing the networks and deep industry knowledge to make participation a reality. BSCF has worked to fill this void by supporting a robust continuous stakeholder involvement process, especially in the field of health policy.

For example, BSCF supports — through the engagement of consultants — the state's Stakeholder Advisory Committee for healthcare policy related to California's Medi-Cal program and the state's application to renew its Section 1115 Medicaid Waiver. While the Foundation itself is not a formal member of this group, it assists the state in setting the agenda for meetings, provides background information and research to inform discussions, covers meeting-related expenses and attends as a nonparticipant to listen and learn.

BSCF's goal in fostering policy discussions is to help generate many different solution ideas for discussion and ensure that those potential solutions have been informed by the best thinking of relevant stakeholders. BSCF does not have a hand in determining which solution is ultimately put forth for consideration or legislation but instead focuses on insuring that discussions leading up to the creation of policy proposals are well informed and include a wide range of voices from the field in question.

shifting conversations from funding to outcomes

Over the past decade, BSCF has focused on shifting policy conversations from thinking of policy only in terms of how it impacts funding to how it impacts outcomes. This shift has occurred in both the healthcare safety net field and in domestic violence in conjunction with the passage and implementation of the Affordable Care Act. In the past, safety net providers and domestic violence service providers were likely to view policy issues only in terms of finance ("How will this policy protect/increase/decrease our funding stream?"). BSCF has encouraged its grantees to consider how they can play a role in policy to help shape their operating environments in the future.

"We've had to help convince folks that there are good outcomes from engaging in policy," explains Long. "The future is the future. You can either rally against it, or you can help change it."

Payment reform is a primary example of shifting conversations. When the idea of shifting from a pay-per-service model to a value-based payment model emerged within the auspices of the ACA, many safety net providers were extremely reluctant or even afraid of the potential outcomes. BSCF encouraged its safety net grantees and their state associations to engage in multiple, broad-based discussions about how value-based payment models could work and could change the environment for safety net providers and their patients for the better. As a result, the field has gradually warmed to the idea of pilot testing value-based payment options in public programs like Medi-Cal.

"BSCF is playing an important leadership role in delivery system reform in California. BSCF's grants have supported consultation, field conversations, research and concept generation, and have paved the way for the type of public-private dialogs needed to engage with the State, managed care plans and the health centers. The foundation staff have valuable and trusted relationships with our clinic members and at all the right moments, they roll up their sleeves and pitch in to reinforce our efforts. They want to know everything that's happening in real time in an effort to help me navigate through challenges. We are both fully invested in this work."

Andie Martinez Patterson,
California Primary Care
Association

training

BSCF has supported policy-related trainings both for nonprofit leaders and government staff. For example, in 2010, a Foundation training helped safety net grantees understand the state budget and how decisions about finance might influence their future. BSCF also has funded the participation of domestic violence service providers in the Women's Policy Institute operated by the Women's Foundation of California. In addition, BSCF's leadership development programs for both fields (the Clinic Leadership Institute for safety net providers and the Strong Field Project's Leadership Development Program for domestic violence service organizations) included training sessions about policy and effecting policy change.

pilot programs

Occasionally, policy ideas need to be tested before large-scale buy-in can occur. For example, in 2011, in anticipation of ACA implementation, BSCF worked with the Los Angeles County healthcare system to pilot an eConsult approach to improving accessibility and lowering costs for an anticipated influx of new patients. The eConsult system allows providers to interact directly with specialists via web connections to discuss the best course of care for patients. Use of the system resulted in a significant reduction in the wait times for in-person visits with specialists, thereby streamlining the patient experience and reducing time and cost for providers. BSCF is now helping to spread the eConsult approach to other counties.

Currently, in the midst of discussion about changing payment systems under Medi-Cal, BSCF is helping research the opportunities for creating a pilot program for a small group of federally qualified health centers (FQHCs) to pilot a payment system that relies more on value delivered and less on fee for service. In 2015, legislation was introduced to authorize the pilot program, supported by the state, and BSCF convened statewide associations and consultants to plan ahead for policy implementation support, including ways to provide technical assistance to provider sites, should this pilot program proceed.

"In healthcare access and coverage issues, foundation funding is a drop in the bucket, so leverage comes from policy engagement."

Barbara Masters,
MastersPolicyConsulting

advocacy at arm's length

While BSCF explicitly does not directly engage in or fund legislative advocacy or grassroots outreach, it has funded some organizations that are actively engaged in the legislative process, such as the California Primary Care Association, the California Association of Public Hospitals and Health Systems and the California Partnership to End Domestic Violence. BSCF also has funded the participation of domestic violence organizations in the Women's Foundation of California's Women's Policy Institute. On the local level, BSCF supported local research and outreach at the Community Clinic Association of Los Angeles County, to help that organization work with the Los Angeles County Board of Supervisors to design the county's Low Income Health Program. Although BSCF does not support any grantee's specific policy advocacy activities, it does strengthen these organizations' efforts by supporting each organization's stakeholder convenings, leadership training and capacity building.

It is important to note that while BSCF supports these organizations and often shares policy goals, the Foundation may choose to travel a different road than its partners to reach those goals. This a natural consequence of the foundation's bold vision for the future of the healthcare and domestic violence fields, and staff have been able to resolve conflict in service of that broader vision. As one grantee organization stated, "We aren't doing payment reform advocacy on [BSCF's] terms, but they trust our development of it and our grassroots approach. In return, we trust them."

supporting policy implementation

Once a policy has been enacted or adopted, BSCF focuses on how to implement that policy in the most effective manner, with fidelity, in a way that truly makes a difference for organizations on the ground and the communities they serve. At the local level, the implementation process can be slow and cumbersome. County and local governments are squeezed in terms of resources and demands and often cannot take a step back to consider a larger view. To help overcome local barriers to implementation, the Foundation works directly with individual organizations and with county governments to help create successful approaches.

For example, the ACA includes a provision that every woman should have access to free domestic violence screenings as part of her health benefit package. However, the implementation of this policy in terms of how and when those screenings are delivered is not specifically mandated. Through research, BSCF discovered that most of those eligible for screenings are not receiving them. But because of its networks and knowledge in the healthcare and domestic violence fields, BSCF is well positioned to convene discussions and generate solutions for a screening system that crosses traditional lines between these two fields. To help implement domestic violence screenings at the local level, the Foundation is supporting 19 local partnerships between safety net providers and domestic violence service providers to establish cooperative approaches. BSCF's support for implementation includes a great deal of technical assistance and capacity building to strengthen each partnership's likelihood of success. BSCF also brings the partnerships together for group discussions that secure a broad cross-section of input that saves hours of time and potential arguments down the road. It also can allow for more creativity of thought and paves the way for a spirit of sharing and collaboration rather than intense competition.

Working at the local level feeds the success of statewide implementation. From its local projects, BSCF gathers and shares input that helps inform implementation efforts at the state level, both for state government and for statewide stakeholder associations like the California Association of Public Hospitals. BSCF also shares the stories of implementation statewide through a series of issue briefs, to help foster replication of successful efforts and help organizations throughout the state avoid pitfalls.

honing in: California's early Medicaid expansion

The passage of the ACA in 2010 created the opportunity for the Foundation to make major investments to realize one of its key goals: achieving universal coverage for all Californians. The ACA expanded Medicaid eligibility for millions of low-income adults on January 1, 2014, with the federal government paying the full cost for the newly eligible. The ACA also allowed a state to expand coverage to low-income adults before 2014 if the state helped pay those costs. To help the state of California seize this opportunity, BSCF supported stakeholder convenings that envisioned how a Section 1115 Medicaid Waiver could enable the state and counties to work together to create the Low Income Health Program (LIHP).

In late 2010, the state reached agreement with the federal government on the “Bridge to Reform” Waiver that permitted counties to create LIHPs to provide Medicaid-like coverage to low-income adults before 2014. From 2010–2014, BSCF invested more than \$9 million to support counties in program planning and implementation, provide technical assistance on program design to state government and fund the LIHP evaluation. These efforts helped 53 of California's 58 counties successfully implement a LIHP, ultimately covering more than 650,000 low-income Californians who were seamlessly transitioned into full Medi-Cal coverage in 2014.

The success of the 2010 waiver has helped shape the state's new waiver proposal under consideration in 2015. BSCF-funded convenings and technical assistance enabled the state to gather broad input and develop a range of ideas for the 2015 waiver that will promote innovative approaches to paying for and delivering care to Medi-Cal enrollees.

investment results are cumulative and interrelated

The results of policy investments are one of the hardest things for foundations to measure. Because no policy “win” is (or should ever be) a direct result of a foundation’s involvement, one must use a broader lens over a long period to determine whether investments in ideas and networks are worth it.

Even though early efforts like the support of California Speaks did not necessarily result in policy change, BSCF recognizes that when funders support the conversation, the state moves forward more rapidly and increases its capacity to bring about meaningful policy change. As a result, California has moved further and faster on subsequent policy issues, such as the Section 1115 Medicaid Waiver that launched the ACA implementation.

Likewise, the endgame of policy work is a constantly moving target. BSCF recognizes that it must commit to a long-term effort without knowing for sure when, or even if, those efforts will pay off in terms of policy change that supports its vision. But BSCF also believes that the policy research and education investments made by foundations build on themselves year after year, and eventually good policy will follow.

Policy conversations among grantee organizations continue to shift toward the proactive. Safety net providers have changed their response to payment reform from defensive and reactive to highly and proactively engaged in shaping the payment policies that will govern their future. Likewise, within the domestic violence field, the policy discussions that occur today are much more robust and the number of policy solutions that are on the table is higher than it was five years ago.

Internally, BSCF has continued to use lessons from its policy experience and its experience as a grantmaker to create an intentional, long-term vision of success and desired outcomes. That vision has become a central organizing focus for the Foundation’s work and has helped to align staff efforts across the board. As a result, the lines between grantmaking and policy work have eroded. The Foundation incorporates more extensive policy discussions on both the healthcare and domestic violence teams as an integral part of the work of each. This, in turn, has made BSCF more effective in the policy arena.

challenges and lessons learned

Unlike traditional grantmaking, where relationships are mostly defined by funder and grantee, policy work engages a vast number of players. With this broader field come a number of challenges that BSCF and other foundations must consider as they plan their strategies.

challenges

- **Knowing the limits.** BSCF, like every foundation, had to maintain rigid oversight to ensure that it stayed within regulatory boundaries that govern foundation advocacy. In addition, it needed to remain mindful of engaging in policy involving topics that could be seen as posing a perceived conflict of interest with the Foundation's corporate parent. In order to ensure compliance, the Foundation vets every single request it receives from the state through both its internal and external General Counsel.
- **Understanding perceptions.** BSCF is still learning how to be aware of its position and influence within the policy sphere. Funder privilege and power can be misconstrued as support for specific policy. A corporate mentality and nimbleness may be seen as being pushy. Nor is it possible for a foundation to remain completely neutral, since there are specific issues that resonate within their missions. Therefore, BSCF makes a concerted effort to acknowledge differences in position and respect the views of all involved.

On the other hand, foundations can add value in the policy sphere by asking hard questions, pushing for needed conversations and providing compelling data and information that spark policy discussions. The key is to balance the roles of vocal leader and unbiased supporter — a task that requires constant attention.

- **Staying ahead of the curve.** Policy conversations that are taking place today often have roots in questions and conversations that arose months or years before. Therefore, to ensure that its contributions to the policy landscape are relevant in the future, BSCF must continue to not only keep a finger on the pulse of what's happening currently but also to think proactively about issues and anticipate what's going to come up in the next six months, year or farther into the future.

"For all foundations, money equates to a fair amount of influence, despite the desire to remain neutral. In choosing to advance a particular issue, it can be challenging if a foundation does not share a potential grantee's policy position. In those instances, it is important for the differences to be acknowledged so that the grantee can seek support elsewhere if possible."

Erica Murray,
California Public Hospital
Association

- **Adapting to the pace.** While BSCF has convened many meetings, there are challenges in breaking through the overwhelming demands on state administrators to get their attention, help them plan ahead and keep them engaged to move the process forward. BSCF relies heavily on trusted consultants to navigate bureaucratic processes and coordinate state engagement — as well as to anticipate anything ahead that foundations can do to support the state's involvement.
- **Maintaining the balance between nudging and listening.** BSCF must be sensitive about when to push stakeholders to keep the conversation moving forward and when to give them space and time to formulate ideas. This requires a different skill set for program officers — someone who's quick on their feet, authentic, agile and adaptive, because the policy landscape is constantly changing. Program officers and other foundation staff must constantly adjust as well. Push too hard one way, and the foundation may seem heavy-handed; don't push hard enough, and the foundation seems out of touch.
- **Adjusting to turnover.** In California, term limits cause constant churning of elected officials and their staff, which means that BSCF and other foundations must conduct regular policy education on complicated issues. Within state agencies, turnover and budget constraints limit capacity growth, meaning that foundations like BSCF play a critical role in providing support for robust stakeholder involvement.

Lessons learned

Above all, the primary lesson learned from BSCF's policy work is simple: Foundation engagement is vital for the public sector and essential for achieving mission. However, several lessons learned are informing BSCF's approach and may be helpful to other funders as well.

- **A narrow focus helps go deeper into policy discussion.** Because BSCF focuses exclusively on the healthcare safety net and domestic violence fields, it is able to accrue a deeper understanding of the issues at play and create a broader network of stakeholders to discuss policy ideas. It also is able to help its own staff focus on those particular policy questions that affect the two fields, rather than on larger, more amorphous policy issues.
- **Cultivate a full spectrum of policy tools.** Policy engagement requires every tool in a funder's toolbox: capacity support, leadership, research, convening and more. For example, the grantees who received leadership development support from BSCF were better able to participate or even take leadership roles in policy discussions within their peer associations. The most effective approaches come from mapping the right strategy or tool against where an issue is in the policy process. Most foundations already have the tools needed and simply have to apply them within a policy context.

"It's important to look at policy investment and policy change as a collective effort across foundations. We have stronger power together versus individually, especially in policy work. We can be the objective voice at the table, can open doors more easily to bring voices of communities served to the table. If we could do that more collectively and find areas for intersection and collaboration, we would be awesome."

Nikole Collins-Puri,
Women's Foundation
of California

- **No one partner can cover the entire policy spectrum.** Instead, funders, governments, advocates and others can find the areas that fit within their comfort zones and expertise and make a meaningful contribution. Not comfortable with advocacy? Do research, convene discussions or create education sessions. Not comfortable with politics? Delivery system reform isn't part of the political spectrum, as are other issues. You can help the safety net create medical homes or figure out how to contract under managed care. Issues like these are not partisan.

While it's important to remember that there is a place for everyone in the policy spectrum, the flip side is true as well: Everyone needs to be in place. Policies absolutely cannot move forward without large-scale collaboration and coordination among many different players. No single entity can or should take on policy change by itself.

- **Working with others increases effectiveness.** BSCF has collaborated with other foundations twice to help shape California's 1115 Medicaid Waivers, first in 2010 and again in 2015. The California Endowment and the California HealthCare Foundation brought their individual strengths and focuses into the mix, creating a full spectrum of support for the state's efforts. Each foundation was able to leverage and build off the "sweet spot" of the others, amplifying the speed of policy development and the depth of policy change. What's more, the continuity of foundation partners and the staff within the foundations has helped all three maintain strong relationships with the state. All remain engaged in supporting the state's policy implementation related to the waivers.
- **Transparency breeds clarity.** While funders may wish to remain completely neutral, there are reasons why policy supports a funder's mission, and it pays to be clear about those connections up front. This helps partners understand what your foundation hopes to accomplish and bring alignment or differences to light. Foundations that are very involved in convening stakeholders should also be clear about the intended outcome, to avoid confusion about the roles of the stakeholders in the dialog. Are discussants supposed to brainstorm ideas? Negotiate approaches? Discuss potential hurdles? The more specific and transparent a foundation is about the hoped-for outcome, the more likely it is that participants will find common ground and better understand diverse perspectives.
- **Maintain organizational humility.** A foundation — particularly one that is new to policy — can be seen as a Johnny-come-lately when others at the table have been toiling around an issue for years. Respect the work and knowledge of those who came before and remember that policy work requires far more learning and fewer actions than one might expect.

- **Know what you're talking about.** While it may be easy (and tempting) to hire consultants to create short summaries of policy points, the real issues will be much more complicated and complex. Getting into the nitty-gritty of policy development and implementation requires a commitment to understanding breadth and depth — what different stakeholders want, what needs to change, what each branch of government brings to the table.
- **Find common ground.** It helps to think about a foundation's policy goals holistically. For example, BSCF, other funders, the state, community health clinics, safety net hospitals and other groups all share the goals of making people healthier and saving money. By examining a goal at this high level and then walking back step by step, you'll see clear opportunities for partnership.

what's next?

The policy environment is constantly changing, and so is BSCF. California has a relatively robust advocacy community as compared to other states, but moving forward, many advocates will need to transition their focus away from coverage and more toward service delivery reform. This shift will require a new understanding of complex and technical issues and increased knowledge about the ways in which service delivery works on the ground. As work around ACA implementation and payment reform move forward, it is BSCF's hope to participate collaboratively in other service delivery reform efforts as well.

In particular, BSCF is examining policy opportunities that are arising where the fields of health care and domestic violence overlap.

Overall, BSCF's vision is to integrate policy so fully into its daily work that it no longer becomes possible to point to single projects — such as the LIHP or payment reform — but instead present a constant pipeline of multiple policy efforts that are in the works and interrelated. Rather than occasional large investments in landmark policy changes, the vision is to contribute to a new rhythm of ongoing, smaller victories that show up on a regular basis. To BSCF, this will be a true indication that our investments in policy are indeed paying off, and that they are sustainable over the long term.

“There's a tremendous role for foundations in the policy arena. They can say things other people can't say, can put things on the table that others can't. In some cases, they have a lot more credibility than advocacy groups.”

Bobbie Wunsch,
Pacific Health Consulting
Group

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