



AGENDA

Compliance & Quality Committee Meeting Board of Governors

Thursday, September 19, 2024, 2:00 P.M. 1055 West 7th Street, Conference Room 100, 1st Floor Los Angeles, CA 90017

Members of the Committee, staff and the public can attend the meeting in person at the address listed above. Public comment can be made live and in person at the meeting. A form will be available at the meeting to submit public comment.

To listen to the meeting via videoconference please register by using the link below: https://lacare.webex.com/lacare/j.php?MTID=m9be303f64b6c7746ef1b5af44ca27f86

To listen to the meeting via teleconference please dial: +1-213-306-3065 Meeting Number: 249 578 02076 Password: lacare

For those not attending the meeting in person, public comments on Agenda items can be submitted prior to the start of the meeting in writing by e-mail to BoardServices@lacare.org, or by sending a text or voicemail to (213) 628-6420. Due to time constraints, we are not able to transcribe and read public comment received by voice mail during the meeting. Public comment submitted by voice messages after the start of the meeting will be included in writing at the end of the meeting minutes.

The purpose of public comment is an opportunity for members of the public to inform the governing body about their views. The Committee appreciates hearing the input as it considers the business on the Agenda. All public comments submitted will be read for up to 3 minutes during the meeting. The process for public comment is evolving and may change at future meetings. We thank you for your patience.

All votes in a teleconferenced meeting shall be conducted by roll call.

If you are an individual with a disability and need a reasonable modification or accommodation pursuant to the Americans with Disabilities Act (ADA) please contact L.A. Care Board Services staff prior to the meeting for assistance by text to 213 628-6420 or by email to BoardServices@lacare.org.

WI	ELCOME	Stephanie Booth, MD, Chair
1.	Approve today's meeting Agenda	Chair
2.	Public Comment (please see instructions above)	Chair
3.	Approve August 15, 2024 Meeting Minutes P.4	Chair
4.	Chairperson's Report	Chair
5.	Chief Medical Officer Report P.16	Sameer Amin, MD Chief Medical Officer
6.	Chief Compliance Officer Report P.30	Todd Gower Chief Compliance Officer
7.	Committee Charter Status Update P.48	Todd Gower

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8. Quality Oversight Committee (QOC) Report

Edward Sheen, MD Senior Quality, Population Health, and Informatics Executive

 Quality Improvement and Health Equity Committee (QIHEC) Report *P.54* Alex Li, MD Chief Health Equity Officer

10. Timely Access to Care Update: MY2023 Survey Results *P.63*

Priscilla Lopez,
Manager, Quality Improvement
Accreditation, Quality
Improvement

11. MY 2023 HEDIS Results **P.92**

Thomas Mendez
Director, Quality Performance
Informatics, Quality Performance
Management

12. Public Comment on Closed Session

ADJOURN TO CLOSED SESSION (Est. time 20 minutes)

13. PEER REVIEW
Welfare & Institutions Code Section 14087.38(o)

- 14. CONFERENCE WITH LEGAL COUNSEL—ANTICIPATED LITIGATION Significant exposure to litigation pursuant to Section 54956.9(d)(2) of Ralph M. Brown Act: Four potential cases
- THREAT TO PUBLIC SERVICES OR FACILITIES
 Government Code Section 54957
 Consultation with: Tom MacDougall, Chief Information and Technology Officer
- 16. CONFERENCE WITH LEGAL COUNSEL—EXISTING LITIGATION Pursuant to Section 54956.9(d)(1) of the Ralph M. Brown Act
 - Department of Managed Health Care Enforcement Matter Numbers: 18-799, 20-063, 21-428, 21-509, 21-680
 - Department of Health Care Services, Office of Administrative Hearings and Appeals, In the matter of: L.A. Care Health Care Plan Appeal No. MCP22-0322-559-MF

RECONVENE IN OPEN SESSION

ADJOURNMENT

The next Compliance & Quality Committee meeting is scheduled on Thursday, October 17, 2024 at 2:00 p.m. and may be conducted as a teleconference meeting.

The order of items appearing on the agenda may change during the meeting.

THE PUBLIC MAY SUBMIT COMMENTS TO THE COMPLIANCE & QUALITY COMMITTEE BEFORE DISCUSSION OF EACH ITEM LISTED ON THE AGENDA BY SUBMITTING THE COMMENT IN WRITING BY TEXT MESSAGE TO 213 628 6420, OR IN WRITING BY EMAIL TO BoardServices@lacare.org. Please follow additional instructions on the first page of this Agenda.

ACTION MAY NOT BE TAKEN ON ANY MATTER RAISED DURING THE PUBLIC COMMENT PERIODS UNTIL THE MATTER IS SPECIFICALLY LISTED ON A FUTURE AGENDA, according to California Govt Code Section 54954.2 (a)(3) and Section 54954.3.

Board of Governors Compliance & Quality Committee Meeting Agenda September 19, 2024

NOTE: THE COMPLIANCE & QUALITY COMMITTEE CURRENTLY MEETS ON THE THIRD THURSDAY OF MOST MONTHS AT 2:00 P.M. AGENDA and PRINTED MEETING MATERIALS ARE AVAILABLE FOR INSPECTION AT http://www.lacare.org/about-us/public-meetings/board-meetings and by email request to BoardServices@lacare.org

Any documents distributed to a majority of the Board Members regarding any agenda item for an open session after the agenda has been posted will be available for public inspection at 1055 W. 7th Street, Los Angeles, CA, in the reception area in the main lobby or at http://www.lacare.org/about-us/public-meetings/board-meetings and can be requested by email to BoardServices@lacare.org.

An audio recording of the meeting is made to assist in writing the minutes and is retained for 30 days.

Meetings are accessible to people with disabilities. Individuals who may require any accommodations (alternative formats - i.e., large print, audio, translation of meeting materials, interpretation, etc.) to participate in this meeting and wish to request an alternative format for the agenda, meeting notice, and meeting packet may contact L.A. Care's Board Services Department at (213) 628 6420. Notification at least one week before the meeting will enable us to make reasonable arrangements to ensure accessibility to the meetings and to the related materials.

BOARD OF GOVERNORS

Compliance & Quality Committee Meeting Meeting Minutes – August 20, 2024

L.A. Care Health Plan CR 1017-1018, 1055 W. Seventh Street, Los Angeles, CA 90017



Members

Stephanie Booth, MD, Chairperson Al Ballesteros, MBA* G. Michael Roybal, MD Fatima Vazquez

Senior Management

Sameer Amin, MD, Chief Medical Officer Terry Brown, Chief of Human Resources Todd Gower, Chief Compliance Officer Augustavia J. Haydel, General Counsel Alex Li, Chief Health Equity Officer

Tom MacDougall, Chief Information and Technology Officer, IT Executive Administration

Noah Paley, Chief of Staff

Acacia Reed, Chief Operations Officer

Edward Sheen, MD, Senior Quality, Population Health, and Informatics Executive

^{*} Absent ** Via Teleconference

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
CALL TO ORDER	Chairperson Stephanie Booth, <i>MD</i> , called the L.A. Care Compliance & Quality Committee and the L.A. Care Health Plan Joint Powers Authority Compliance & Quality Committee meetings to order at 2:00 P.M. She announced that members of the public may address the Committee on each matter listed on the agenda before the Committee's consideration of the item by submitting their comments via text, voicemail, or email.	
APPROVAL OF MEETING AGENDA	The meeting Agenda was approved as submitted. Chairperson Booth stated that Dr. Li will give a Chief Health Equity Officer update at the September meeting.	Approved unanimously 3 AYES (Booth, Roybal, and Vazquez)

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
PUBLIC COMMENT	There was no public comment.	
APPROVAL OF MEETING MINUTES	The June 20, 2024 meeting minutes were approved as submitted.	Approved unanimously.
CHAIRPERSON REPORT	Chairperson Booth reported that although they had initially planned not to say much, an external evaluation prompted further discussion. The evaluation suggested that processes should enable business growth, but she disagreed with the assessment that their organization lacked a foundational risk management system. She emphasized that they have been refining their approach for some time, and significant improvements have been made. The process has become repeatable, evidenced by the fact that it is being implemented again this year. They have addressed prior issues and believe the organization is proactive, particularly in identifying personnel and IT-related challenges. Chairperson Booth expressed confidence that the evaluation underestimated their progress in risk management. Mr. Sobetzko stated that the Gartner consultant's role was to help the organization grow and mature its risk management processes. While the organization has been making improvements year over year, including changes in tools and methodology, Mr. Sobetzko emphasized that true scalability and repeatability would eventually make risk management an ingrained part of operations. He spoke about the formation of a risk committee as a significant step forward, noting that this committee moves the process from being managed by a small team within compliance to engaging the entire organization. This broader involvement is crucial for making risk management a foundational process. He explained that while the organization is still reactive in many ways, the goal is to reach a point where risk management is fully integrated into the business, informing strategic decisions rather than reacting to surfaced risks. Mr. Gower stated that their discussions around risk have evolved from being ad hoc to more structured and mature. Weekly meetings with the cabinet and the risk committee have helped identify key risk issues. Additionally, terms like "inherent risks" and "residual risks" are now part of their regular discussions, reflecting progress. He mention	

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	solid foundation for 2025. He noted that the process involved collecting and organizing a significant amount of unstructured data from prior years, including interviews and survey information. Now, with a more structured approach and a better-defined risk register, the organization is in a stronger position to approve and utilize this data. Mr. Gower said that this structured foundation is a crucial improvement for the executive team and the organization as a whole. Mr. Sobetzko added that a key missing component for reaching foundational risk management is defining the organization's risk tolerance. He explained that the organization needs to clearly establish its appetite for risk, so when risks arise, they can be assessed based on whether they exceed or fall below acceptable thresholds. This would make risk management more formulaic, allowing for a clearer prioritization of efforts based on the level of residual risk and the organization's tolerance. Much of the process relies on intuition and discussion, which, while important, lacks clear thresholds. He hoped that they would reach this point within the calendar year, and if the necessary tools and frameworks are implemented, the organization would achieve foundational risk management. Though the goal is to eventually move beyond this level, he stated that even a small step beyond the foundational stage would be a positive outcome.	
COMPLIANCE & QUALITY COMMITTEE CHARTER STATUS UPDATE	Todd Gower, <i>Chief Compliance Officer</i> , discussed the Compliance & Quality Committee Charter Process. Mr. Gower provided an update on the committee charter, stating that they have reached a good agreement on its contents. Although he had hoped to finalize it earlier, that was not completed. He will send it out for review soon, as the charter is now in its final stages. The next steps involve checking for spelling, grammar, and other minor details before sending it to the board and leadership team for review and approval at the next Compliance & Quality committee meeting. He noted that the suggested changes are minor, with no major format changes needed.	
CHIEF COMPLIANCE OFFICER REPORT	Todd Gower, Chief Compliance Officer, and the Compliance Department staff presented the Chief Compliance Officer Report (a copy of the full written report can be obtained from Board Services). Mr. Gower's report provided an overview of the compliance efforts within the organization. He emphasized the consistency of their internal compliance committee's process, which has helped address compliance issues transparently across the organization. He spoke about the ongoing refinement of how these issues are presented to the board and executives in a clearer manner. Mr. Gower, alongside Mr. Paley and Dr. Amin, is focusing on improving delegation oversight. While there is already a good process in place, further refinements are needed. They are addressing concerns related to FDR oversight to ensure compliance with guidelines from the Department of	

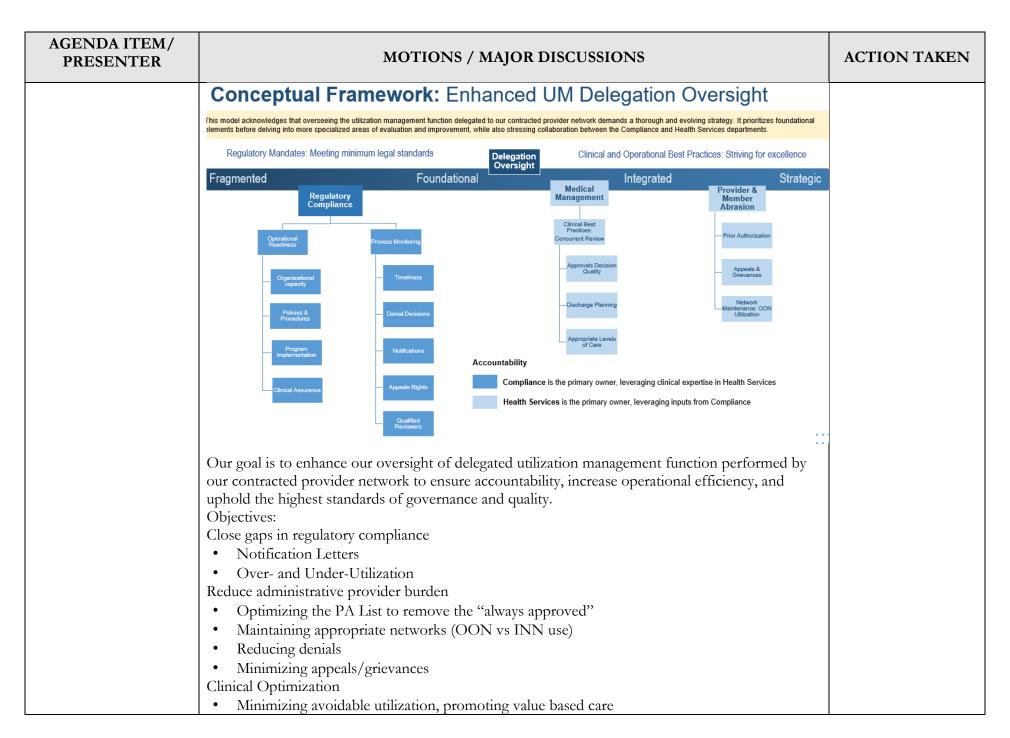
AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	Justice and Office of the Inspector General. Though progress has been made, there are still areas to improve to achieve a more robust and effective compliance organization.	
	Mr. Sobetzko gave a Risk Committee report. 2024-2025 Enterprise Risk Assessment He stated that Allysa Johnson from Gartner presented at the Risk Committee meeting on July 2. Goals for the Risk Management Team: Build survey Top Risks by Risk Score Top Risks by Demographic / Functional Area Communication and Best Practices Risk Appetite Mr. Sobetzko's outlined several key initiatives currently underway. In collaboration with the Gartner group, the committee is building a new enterprise risk assessment for 2025. The process involves the entire organization, with each department contributing to a risk catalog that identifies potential risks across the enterprise. This catalog will form the basis for a risk survey, which will guide the assessment process. The committee members are responsible for sharing this information with their teams and providing their department's perspective on potential risks. The enterprise risk assessment will focus on risk identification, monitoring, and aligning with the organization's risk appetite, or tolerance for risk. Once the risk catalog is finalized, surveys will be deployed, and Gartner will help analyze the data to provide insights into the areas of greatest risk. This process will integrate data from various sources, such as issues inventories and corrective action plans, to evaluate the true residual risks. Mr. Sobetzko said that the risk committee will review past management action plans from previous assessments. The committee aims to shift from solely relying on compliance reports to leveraging the expertise of those managing the action plans, fostering a broader and more collaborative approach to risk management. This will enable the committee to gain deeper insights and ensure timely, data-driven risk mitigation strategies.	
	Amanda Asmus, <i>Director, Care Management, Care Management</i> , gave a report on the timely completion of Health Risk Assessments (HRAs) for Medi-Cal and dual members, emphasizing the regulatory and clinical risks of delays. If HRAs are not completed promptly, the organization risks regulatory violations and impacts members needing high-intensity care coordination. To mitigate this risk, operational reports were developed to oversee and ensure timely completion of HRAs. The Medi-Cal HRA reports were expanded to include new populations as of January 2023, and these reports	
	were fully operational by July 2024. Similarly, the DSNP HRA reports were also fully operational by July 2024. As a result, the older CMC HRA reports used for ad hoc outreach are being phased	

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	out. Ms. Asmus noted the development of an Optum Impact Pro report that identifies high-risk members per Department of Health Care Services (DHCS) guidelines. This report is still being iterated to comply with changing DHCS regulations, with an estimated completion date yet to be determined.	
	Greg White, Director, Healthcare Analytics, Risk Adjustment Strategies & Initiatives, reported on the challenges surrounding the timeliness and quality of encounter data intake. The primary risk involves the impact on Prop 56 and other programs, where accurate and timely data submission to DHCS or CMS is necessary for reimbursement and correct risk score calculations. To address this, an Encounter Data Governance Committee was established based on consultant ecommendations, with its charter completed on July 1. He said that physician provider group (PPG) outreach has been initiated to monitor and assist with data submissions. Analysts are assigned to the largest PPGs to help correct submission errors, although staffing limitations prevent covering all PPGs. This outreach began in November and remains ongoing. Mr. White also spoke about the development of Key Performance Indicators (KPIs) for encounters, aimed at creating a unified data source for the entire enterprise. This effort started in July, with full implementation expected by the end of the year. He noted that a staffing analysis and enhancement request for the 2025 budget to monitor PPG submissions more effectively and investigate errors. This request was initiated in July, with an expected decision by the end of September. Member Roybal asked if L.A. Care gets a its data from clearignhouses or doed it get data from each individual PPG. Mr. White responded that all capitated providers submit data through a clearinghouse vendor, FinThrive, as monitoring each PPG's file individually would require significantly more staff. FinThrive is commonly used by PPGs to submit to multiple healthcare entities. Fee-for-service providers and hospitals, on the other hand, submit data through the claims system, QNEXT. He clarified that FinThrive performs initial checks for syntactical errors before data reaches LA Care. If L.A. Care rejects the data, it is sent back to the PPG for corrections. LA Care prefers to receive all data, whether accepted or rejected, in order t	
	Miguel Varela Miranda, Senior Director II, Regulatory Operations, Compliance, gave Compliance Monitoring Summary, Compliance Delegation Oversight Summary, and Dual Special Needs Plan (DSNP) Oversight Summary (a copy of the slides can be obtained from Board Services).	
	Penny Winkfield, Director, Information Security Risk and Compliance, IT Executive Administration, gave a Information Technology Risk Report Out. Vulnerability Management Program Summary:	

PRESENTER	MOTIONS / MAJOR DISC	CUSSIONS		
	Over the last year, the Information Security (InfoSec) Dep focusing on redesigning the department to align with and staffing the newly designed InfoSec department with subject legacy technologies for better visibility into malicious activities behaviors has reduced the probability of exploitation and insecurity posture. One of the next areas of focus is to implement a formalize Vulnerability Management is a vast topic which consist of of which are significant components within the program. Managing all of the complexities associated with a Vulneral dedicated resources focused on identification, remediation conjunction with correlating the likelihood of exploitation exploitation were to occur.	support the varie ct matter exper- ities and deviati- ncreased the org d Vulnerability people, processed bility Management, and tracking o	ous business vers, and modern ons from known ganizations over Management in es, and technoment Program references	rerticals, nizing wn rerall Program. clogies, all equires es, in
	ACTIVITY	STATUS	Start Date	End Date
	Hire a dedicated Vulnerability Program Manager	Complete	4/18/24	6/14/24
	Formalize a Vulnerability Management Program	In Progress	6/5/24	2/14/25
	Consolidate vulnerability efforts across InfoSec teams	In Progress	7/15/24	10/31/24
	Configuration of VM Tooling	In Progress	7/15/24	2/5/25
	Develop VM Tooling Capabilities and Requirements	Not Started	8/5/24	9/5/24
	Procurement of Tools	Not Started	9/5/24	12/5/24
	Develop a process to identify and prioritize vulnerabilities	Not Started	8/5/24	9/5/24
	Develop a process track and validate remediation efforts	Not Started	8/5/24	9/5/24
	Define and report on performance measures	Not Started	8/5/24	9/5/24
	Develop data retention process mapped to HIPAA	Not Started	9/5/24	2/5/25
	Develop metrics to track improvements	Not Started	8/5/24	2/14/25

AGENDA ITEM/ PRESENTER	МС	OTIONS ,	/ MAJOR DIS	SCUSSIONS		ACTION TAKEN
	facilitates risk assessments and parise. He noted that this program timeline. A dedicated vulnerability vulnerabilities to include factors take a holistic approach to vulnerabilities.					
	Chairperson Booth asked if the responded that it can be related can be a combination. Mr. Gow	to softwar	e or hardware.	That is part of all of these asse		
	Mr. Sobetzko gave an Issues Inv Issue Name and Description	Date	Accountable Exec./Business	Remediation Description	Date Remediated	
	Overpayment by enrollee for deductible and out-of-pocket maximum (OOPM). Enrollee was charged over the enrollee's deductible and out-of-pocket maximum (OOPM) (1187)	12/5/2019	Unit Soledad Castillo	The members out-of-pocket- maximum (OOPM) reimbursements were completed for calendar years member 2018, 2019, 2020 & 2021.	5/28/2024	
	Soledad Castillo, Senior Director, of a report on Overpayment Dedu Ms. Soledad Castillo reported the had already met their maximum. The root cause was a lack of cles of communication with PPGs. The track members nearing or exceed established to ensure that once the collected.	ctible and nat L.A. Ca out-of-po ar oversigh To address ding their	Out-of-Pocket are had been co cket (MOOP) I nt regarding wh the issue, a dai MOOP. Comm	Maximum. llecting copayments from mer imits for the years 2018 through the members met their MOOF ly monitoring dashboard was nunication channels with PPG	nbers who gh 2021. I and a lack created to s were also	

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	Ms. Castillo explained that the effectiveness of these measures is being monitored through daily reports and monthly lookbacks for the next 90 days to confirm that the processes are working. The team also conducts an annual review to check for any members who paid beyond their MOOP and promptly remediates such cases. Reimbursement for affected members has been completed, except for four cases where checks were returned. In these cases, further steps are being taken to update addresses and resend the checks. Ms. Castillo also mentioned that L.A. Care collaborates with PPGs to verify the data, create claims for reimbursement, and ensure accuracy through their Quality Assurance team and finance department. Any checks that remain uncashed after 90 days are sent to the state if a member cannot be reached.	
	Miguel Barcenas, Director, Provider Contracts and Relationship Management, Provider Network Management, reported on an issue involving three providers who failed to submit their recredentialing documentation on time. These providers were identified, and LA Care took steps to remediate the situation by April. Each provider was successfully recredentialed, with their cases closed upon completing the necessary documentation reviews. To prevent similar issues in the future, L.A. Care has implemented a process where account coordinators review monthly credentialing reports to identify providers nearing recredentialing deadlines. The coordinators then notify both the manager and account manager, who in turn remind the providers to submit their recredentialing documentation to stay compliant with the program. (A copy of the full Compliance Officer Report can be obtained from Board Services.)	
CHIEF MEDICAL OFFICER REPORT	Sameer Amin, MD, Chief Medical Officer, gave a Chief Medical Officer report (a copy of the materials can be obtaidne from Board Services).	



AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	Framework for Health Services Enhanced Delegation Oversight Activities 1 Gather comprehensive data on delegates 2 Analyze collected data to identify trends, root causes, and areas for improvement. 3 Provide feedback to PPGs based on the analysis and make actionable best practices recommendations 4 Support PPGs in implementing recommended changes and monitor their progress 5 Evaluate the effectiveness of the new soft function and identify areas for improvement	
TRANSITIONAL CARE SERVICES (CalAIM)	Joycelyn Smart-Sanchez, Director, Care Management, Care Management, gave a presentation on Transitional Care Services (a copy of the presentation can be obtained from Board Services). Ms. Joycelyn Smart-Sanchez, Director of Care Management for Medi-Cal at LA Care, provided an overview of the Transitional Care Services (TCS) program. TCS focuses on supporting members as they transition from one level of care to another, such as from hospitals to home care, ensuring they receive the necessary services and support to safely transition to a lower level of care. Ms. Smart-Sanchez said that while TCS builds on existing practices, it introduced new responsibilities for care managers, such as conducting discharge risk assessments, coordinating post-discharge follow-ups, and ensuring timely communication with primary care providers (PCPs). The program is particularly focused on high-risk populations, including those with specific medical conditions, pregnant and postpartum members, and individuals eligible for Enhanced Care Management (ECM) or Community Support (CS) services. The TCS program was rolled out in phases, starting in January 2023 for high-risk members, with all Medi-Cal members becoming eligible in January 2024. Ms. Smart-Sanchez detailed the different teams within LA Care that manage TCS for various populations, including ECM teams, Community Health Workers, and specialized teams for long-term care and pregnant members. She noted the importance of care coordination, where TCS caremanagers serve as the single point of contact for members, ensuring seamless communication between healthcare providers and facilitating access to necessary services. Ms. Smart-Sanchez also discussed the program's key performance indicators (KPIs), including the percentage of high-risk	

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	members contacted within seven days post-discharge and follow-up with PCPs. She acknowledged variability in data reporting across different health plans, which the state is currently addressing to standardize data collection methods. As of the end of the previous month, the TCS program had served nearly 17,000 members, reflecting its growing impact. Despite being a relatively young program, TCS continues to expand, with ongoing efforts to increase staffing and improve service delivery.	
QUALITY IMPROVEMENT	Rachel Martinez, RN, BSN, Supervisor, Quality Improvement, Quality Improvement, gave a presentation about Quality Improvement Projects (a copy of the presentation can be obtained from Board Services).	
PROJECTS (QIPs/PIPS, PDSA)	Ms. Martinez reported on four types of regulatory projects: Quality Improvement Projects (QIPs), Performance Improvement Projects (PIPs), Plan-Do-Study-Act (PDSA) cycles, and Strengths Weaknesses Opportunities and Threats (SWOT) analyses. These projects vary in duration and scope, with PDSAs and SWOTs typically initiated by Medi-Cal when minimum performance levels are not met, such as the 2022 SWOT for Well-Child Visits and Childhood Immunization, which closed in 2023. She also highlighted upcoming PIPs for 2023-2026 focusing on disparities in well-child visits for Black/African American children and behavioral health needs related to emergency department use.	
STARS UPDATE D- SNP	Donna Sutton, Senior Director, Stars Excellence, Quality Improvement, gave a D-SNP/Stars Quality Update (a copy of the presentation can be obtained from Board Services).	
	Donna Sutton provided an overview of the D-SNP (Dual Eligible Special Needs Plans) program, explaining the purpose of the Stars Quality Program, which serves as a tool for Center for Medicare and Medicaid Services (CMS) to implement federal policy, provide oversight on health plan performance, and offer consumers information to make informed decisions. She outlined the program's timeline, emphasizing that it takes up to three years to receive payment based on performance, and described the 39 metrics across five domains that determine the star rating. Additionally, she discussed new evaluation measures for improvement in Part C and Part D, the impact of the Categorical Adjustment Index (CAI) for plans serving higher-risk populations, and the significance of maintaining high star ratings for financial incentives and industry positioning.	
PUBLIC COMMENT ON CLOSED SESSION ITEMS	There was no public comment.	

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN		
ADJOURN TO CLOSED SESSION	Augustavia J. Haydel, Esq., <i>General Counsel</i> , announced the following items to be discussed in closed session. The JPA Compliance and Quality Committee meeting adjourned and the Compliance and Quality Committee adjourned to closed session at 4:51 P.M.			
	PEER REVIEW Welfare & Institutions Code Section 14087.38(o)			
	CONFERENCE WITH LEGAL COUNSEL—ANTICIPATED LITIGATION Significant exposure to litigation pursuant to Section 54956.9(d)(2) of Ralph M. Brown Act: Four potential cases			
	THREAT TO PUBLIC SERVICES OR FACILITIES Government Code Section 54957 Consultation with: Magdalena Marchese, Senior Director, Audit Services, Executive Services			
		nt to Section 54956.9(d)(1) of the Ralph M. Brown Act partment of Managed Health Care Enforcement Matter Numbers: 18-799, 20-063, 21-428, 21-509, 21-680 partment of Health Care Services, Office of Administrative Hearings and Appeals, In the matter of: L.A. Care Health		
RECONVENE IN	The Committee reconvened in open session at 5:10 p.m.			
OPEN SESSION	There was no report from closed session.			
ADJOURNMENT	The meeting adjourned at 5:15 p.m.			

Respectfully	submitted by:	
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Victor Rodriguez, Board Specialist II, Board Services Malou Balones, Board Specialist III, Board Services Linda Merkens, Senior Manager, Board Services

APPROVED BY:

Stephanie Booth, MD, Chairperson	
Date Signed:	



CMO Report: September 2024

Health Services Update

Medical Management Quality Management Community Health Pharmacy

> Sameer Amin, MD Chief Medical Officer, Health Services



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Strategy Management

As part of our annual strategic planning efforts, L.A. Care's Health Services (HS) Department is planning a two-day **Strategy Summit** engaging senior leadership and management across all HS functional areas to plan the 2025 Health Services Program Strategy, a first of its kind living strategic guiding document meant to (1) facilitate the bi-directional cascade of information within the department and between the department and its external business unit partners across the enterprise, and (2) designed to promote strategic alignment, integration, and collaboration.

In addition to mapping out the department's strategic goals and objectives for the upcoming year in alignment with the enterprise strategic vision and goals, we are generating a list of strategic initiatives meant to address the following priority areas:

- Streamlining Medical Management: Identifying interdependencies within and between the Medical Management department to ensure seamless integration, authorization and referrals of new, policy-driven programs and services, e.g., CalAIM Enhanced Care Management (ECM), Transitional Care Services (TCS), and Community Supports (CS)
- Optimizing Population Health Management: Focusing on improving Care Coordination and Integration, Data Analytics and Technology, and Preventive and Proactive Care including Chronic Condition and Disease Management for enhanced population-based and member-centric outcomes and reduced adverse utilization.
- Clearing Pathways for Collaboration with External Business Unit Partners:
 Enhancing the ways in which the Health Services team engages with and critical enterprise teams like Finance, Operations, Compliance, and IT to maintain operational stability and achieve strategic agility in an rapidly changing regulatory landscape and industry environment.

The next issue of this report will provide an executive summary-level detail of the topics addressed and the decisions made as part of the finalization of the 2025 Health Services Program Strategy. Stay tuned!

Medical Management

Enhanced Care Management (ECM)

Enhanced Care Management (ECM) under CalAIM is designed to provide personalized, intensive care coordination for Medi-Cal members with complex health and social needs. ECM brings together medical, behavioral, and social services to ensure a comprehensive, personcentered approach. By coordinating care across different providers and agencies, ECM aims to improve health outcomes, reduce hospitalizations, and lower healthcare costs, supporting CalAIM's goal of transforming Medi-Cal into a more holistic and equitable healthcare system.

Enrollment

L.A. Care continues to work towards the goal of enrolling 30,000 members in ECM. The initial Q2 2024 enrollment data, including Plan Partners, shows 16,725 members enrolled, reflecting a 7% increase from the previous quarter (15,759). This growth in Q2 2024 was driven almost entirely by L.A. Care, thanks to the ECM team's enrollment push, which included new incentive payments and improved referral and lead processes.

Contracting and Network

Providers have responded well to the Payment Model (PUPM) amendment, and the team is closely monitoring any risks for those who may not meet the October 1, 2024 signature deadline. L.A. Care's ECM network now includes 85 contracted providers. To focus on Providing Access and Transforming Health (PATH) initiative provider-recipients and providers with a Justice-Involved specialty, we have slowed the overall growth of our network. While we expect further growth throughout 2024, new providers joining later this year will primarily be those with expertise in Justice-Involved, Birth Equity, or Child Welfare populations.

Audit and Oversight

Our ECM Monitoring and Oversight Program launched in Q3, during which we audited 30 ECM providers and reviewed over 80 member cases.

Key Findings: Since this was our first audit, we uncovered areas for improvement:

- Inconsistent or incomplete documentation by providers.
- Gaps in the development of care plans.
- Issues with timely and accurate Transitions of Care (TCS) interventions

Performance Highlights:

- Highest Performing Area: Enhanced Care Coordination ranked the highest in our audit.
- Lowest Performing Area: TCS interventions ranked the lowest.

Next Steps:

- Gap Closure Plans: We will provide all providers with a Gap Closure Plan to track progress on addressing the identified issues.
- Expanded Audits: In the next quarter, we plan to expand the audit to include more providers

Care Management for Dual Eligible Special Needs Plans (D-SNP)

Case Volumes

Through July 2024, the DSNP Care Management (CM) team experienced an uptick in both new referrals and overall active high-risk and complex cases under management. This increase resulted from the Health Risk Assessment (HRA) process for new DSNP enrollees and existing members needing their annual reassessments, as well as cases identified through predictive modeling as eligible to receive ECM-like services. In July 2024 alone, there were 97 new DSNP CM referrals. In total, over 1,111 DSNP CM cases were active with the LAC Care Management team, representing approximately 5.6% of the entire DSNP membership.

Care Management for MCLA Members

Case Volumes

- During July 2024, the LAC CM team created 416 MCLA CM cases and conducted initial outreach to offer members CM support.
- In total, over 1,500 MCLA CM cases were active, with members either participating or in active outreach.
- For Transitional Care Services (TCS), the LAC team sustained an increase in the number of high-risk TCS cases outreached through July. During that month, over 2,300 members were contacted and offered TCS support. The team is collaborating with the Analytics Team to enhance and expand real-time admission notifications via Health Information Exchanges (HIEs). Currently, all but two contracted hospitals in Los Angeles County (West Hills and Lakewood) are on an HIE platform. Our data algorithms help immediately identify members who fall under the "DHCS High Risk" category for TCS purposes. Low risk TCS members began receiving post discharge notification of their ability to access TCS services. To date, a total of 42 low risk members have contacted the TCS Central Intake Line to request TCS support.

Utilization Management

Timeliness of UM Decisions and Notifications

The UM department has shown exceptional operational compliance from January to June 2024, with nearly all quantitative compliance measures for timeliness of decisions and notifications consistently exceeding 95% across multiple lines of business, including MCLA, LACC, PASC, and D-SNP. This improvement is particularly notable in light of the updated measures for

commercial lines of business, which now account for extensions and have contributed to the enhanced compliance rates. Not a single measure fell below 90%, underscoring the department's commitment to maintaining high standards of timeliness and accuracy in UM processes. The department's success in these areas highlights its strong adherence to regulatory requirements and its effectiveness in delivering timely care decisions to members.

Managed Long Term Services and Supports (MLTSS)

CalAIM & Community Supports (CS)

Efforts to increase referrals and enrollment in all MLTSS CS-administered programs continue. Services are promoted in various provider forums as well as through internal education and training for cross-functional teams across the organization. Referrals to Personal Care and Homemaking Services have seen a significant increase, averaging 137 per month since October 2023, compared to an average of 40 per month in the previous fiscal year. Referrals to Respite Care and Environmental Accessibility Adaptations also continue to rise, with a current authorization rate of 73%, an increase of 3% points since the last report.

Nursing Facility Transition and Diversion to Assisted Living Facility (NFTD) and Community Transition Services (CTS) to home and other private community settings became effective on January 1, 2024. Currently, three providers are contracted, with more to be added during the scheduled Letter of Interest process. Referrals for both programs have steadily increased, originating from hospitals, skilled nursing facilities, and internal teams (Utilization Management and Care Management) via Interdisciplinary Care Teams (ICTs). To date, the average number of referrals is 20, an increase from 17 in the last report, with an authorization rate of 97%, an increase from 82% in the last report. Trends and outcomes will continue to be monitored and reported.

CalAIM & Benefits Standardization

Since January 1, 2024, Intermediate Care Facilities for the Developmentally Disabled (ICF-DD) long-term care became a Medi-Cal Managed Care covered service. Contracting efforts are ongoing with nearly 200 facilities throughout the county, most of which are new to managed care. Phase I of DHCS's Post Implementation Network Readiness Requirements has been completed and approved, and Phase II is currently underway, with a due date for DHCS submission in June 2024. The L.A. Care MLTSS, Provider Network Management (PNM), and Credentialing teams have worked to ensure all DHCS requirements are met. As of April this year, the ICF-DD census was 326, and has increased to 337 by end of July 2024.

Quality Management

Health Education, Cultural, and Linguistic Services (HECLS)

Meals as Medicine Program

The Community Supports Meals as Medicine (MAM) program has been experiencing steady growth. In July, the program hit 500+ service authorization requests, the highest number since the program's inception in January 2022, and as compared to the latest record of ~400 requests in the last reporting term for April 2024. The team is evaluating staffing plans against operating model to prepare for future surges.

Doula Program

To date, 185 L.A. Care Medi-Cal pregnant members have been recommended for doula services. 108 members have been serviced by a Doula. Data pending on 33 members from contracted doula organizations. Remaining 44 members were either not interested or unable to contact.

DHCS Transitional Care Services (TCS) for Birthing Individuals

This TCS program for Birthing Individuals moved under Health Education maternal programs in May. Every pregnant member who has had a hospital discharge is contacted by a Community Health Worker/Case Manager, who connects them to relevant resources and facilitates scheduling of provider follow-up visit.

Fight the Glue and Covid Campaign

The campaign will be launching in September with multipronged activities including a social media campaign, automated calls, texting campaign, <u>MyHIM</u> member portal messaging, member newsletter, email blast to PPG network on the importance of educating and vaccinating all patients, and flu and Covid vaccine clinics at local CRCs.

Initiatives

Improved Quality Performance Resulting in Reduced Policy Sanctions

L.A. Care is seeing substantial decrease in Medi-Cal measurement year (MY) 2023 Managed Care Accountability Set (MCAS) sanctions, from \$890,000 in MY 2022 to \$300,000. For measurement year 2023, 15 out of 18 measures showed significant performance improvements. Lack of reliable state data feeds for the Follow Up After Emergency Department Visit for Substance Abuse (FUA) and Follow Up After Emergency Department Visit for Mental Illness (FUM) HEDIS measures remains a challenge. The 2024 performance trends are positive with many measures showing YTD improvement compared to 2023.

One headwind to keep in mind is impact of Kaiser plan partner exit which will has "across the board" impact on quality measure performance based on Kaiser's historical performance lifting measures. Overall, the organization is seeing better performance compared to the previous year in prioritized quality domains.

Well-Child Visits in the First 30 Months of Life

L.A. Care continues discussions with Quality Health Partners (QHP) on co-hosting WCV events with Blue Shield Promise at the Community Resource Centers (CRCs). L.A. Care has begun contract discussions with QHP and plans on attending a Blue Shield Promise event on August 23rd to observe.

DHCS Child Health Equity Collaborative

L.A. Care is conducting a site visit to Northeast Valley Health Corporation-Sun Valley on July 30 to observe the member journey for Hispanic and Latino infants receiving well child exams, developmental screening, and vaccinations to complete the requirements for Intervention 2. Additionally, the project team will conduct six interviews: three with providers, office staff, and medical directors and three with caregivers and families of patients to better understand member needs and opportunities for clinic-level improvement. The next submission is due August 15th.

Provider Quality Review (PQR)

Operational Efficiency Monitoring

The PQR team has maintained a timely closure rate of above 99% for FY2023-2024.

Audits & Oversight

PQR has completed Q2 2024 oversight of Appeals and Grievances (A&G) and Customer Solution Center (CSC) to audit and identify any potential missed quality of care or service concerns for PQI investigation. Collectively, 27 cases in Q2 2024 (18 from A&G and 9 from CSC) were identified as opportunities for potential quality review. The PQR team continues to provide collaborative feedback to drive process improvements with both departments and value their collaborative spirit.

Collaboration with A&G

In May 2024, A&G implemented a new quality of care review process with physician review of grievances; however, without RN reviewers. The new workflow transitioned to include RN reviewers in July 2024. PQR conducted multiple clinical training sessions in July - August 2024, to support the newly on-boarded A&G RNs to ensure full implementation. PQR continues to provide additional training support, as needed to ensure potential quality of care concerns are addressed.

Stars/HEDIS Performance

- Overall HEDIS domain performance is thus far projected to increase from 2.50
 Stars rating in MY2023 to 2.79 Stars rating in MY2024. Pharmacy is also projected to increase in overall domain performance of 3.15 Star ratings in MY2023 to 3.62 Stars rating in MY2024 resulting from an increased effort of LAC internal pharmacy-staffed programs.
- Operation domain performance however is projected to decline from 3.80 to 3.62 Stars rating. The decline in the Operations domain is due to a significant decline in the Reviewing Appeals Decision measure.
- LACC MY2023 is projected to earn, using June 2024 refresh data, an overall summary indicator rating of 76 achieving a Star Rating of 3, just 4 points short of achieving a 4 Star
- LACC MY2024 year to date, using June 2024 data, is performing higher than prior year to date. Clinical Quality is performing at 60.080 year to date which is 8 points higher than same time last year. Overall projected year-end rating for MY2024 is currently projected at 76.100 and at a Star Rating of 3.

Population Health Management (PHM)

PHM Program Description:

The PHM team has completed the draft of the 2024 PHM Program Description, incorporating CalAIM requirements and intervention updates. The review is currently in process, after which the document will be finalized and posted publicly.

Collaborative Efforts and SMART Goals:

The PHM team is leading collaborative efforts with local health departments and L.A. County health plans to reduce maternal and infant mortality disparities for Black and Native American persons by 10-15% annually, aiming to achieve a BOLD goal of 50% reduction by December 2025. This includes:

- Advancing the Doula Hub initiative.
- Collaborating with SCAN on a SMART goal for older populations.
- Engaging a consultant from HMA to facilitate efforts, with the contract in progress.
- Developing regular workgroups focused on resources/funding, planning, and data, with the next deliverable on track for October.

Population Health Informatics

Health Information Ecosystem (HIEc)

Health Information Exchange (HIE) Amendments: The Hospital Services Agreement (HSA) is being updated to require mandatory participation in HIEs for hospitals, ensuring compliance with CMS 9115-F standards for ADT notifications and engagement with the California Health and Human Services (CalHHS) Data Exchange Framework (DXF). Similar updates are being applied to Skilled Nursing Facility contracts to facilitate more efficient information exchange.

Incentive Programs: Participation in HIEs is a critical component of the newly launched Hospital Pay-for-Performance (P4P) and Skilled Nursing Facility (SNF) P4P Programs. These programs offer ongoing incentives for achieving HIE participation milestones. A new HIE Participation Measure has been introduced within the Physician P4P program, enabling Federally Qualified Health Centers (FQHCs), small, and solo providers to earn annual incentives by achieving HIE-related milestones, promoting the adoption and meaningful use of HIEs.

Incentives

We stablished the new L.A. Care Provider Honor Roll to recognize providers who scored in the top 20% of the Physician P4P Program. This will be an annual recognition where providers are sent a window cling to display in their offices. The 2024 letters and window clings were mailed out in July, ongoing communications via print and web to publicize the honor roll will happen.

Community Health

Community Supports (CS) Operations & Reporting

Why it matters: Community Supports are a part of the Department of Health Care Services' (DHCS) broader effort to provide enhanced care and address social determinants of health through the Medi-Cal program. These support are offered under the California Advancing and Innovating Medi-Cal (CalAIM) initiative, which aims to improve health outcomes for Medi-Cal beneficiaries by offering a broader range of services that go beyond traditional medical care.

Community Supports (CS) Provider Network

L.A. Care established a provider network for community supports by identifying, contracting with, and coordinating a range of community-based organizations, service providers, and other entities that can deliver the non-medical services covered as part of the CS benefit. A robust provider network for these services is crucial for organization to effectively address social determinants of health, improve member outcomes, and reduce healthcare costs by ensuring comprehensive, coordinated care.

In our last report, we informed you that for the January 2025 contracting cycle, the CS provider Letter of Interest (LOI) was released in May of this year to support the development of the CS provider network. Review of the CS certification applications has since been completed and we are actively notifying selected providers of their inclusion of the network.

Latest in CS Implementation and Member Engagement

The newest community supports launched in July, including **Day Habilitation** and **Short-Term Post-Hospitalization Housing (STPHH)**. Day Habilitation provides structured activities and skill-building programs designed to enhance daily living skills, socialization, and community integration for individuals with disabilities or chronic conditions. The STPHH benefit offers temporary housing and support services for individuals transitioning from a hospital stay, ensuring a safe recovery environment while addressing immediate housing needs and preventing readmissions.

Behavioral Health Services

Spotlight: Behavioral Health Services for L.A. County's Students

The DHCS Student Behavioral Health Incentive Program (SBHIP) aims to enhance access to behavioral health services for students by incentivizing managed care plans to collaborate with schools, providers, and community organizations, thereby addressing mental health and substance use needs among California's youth. This program focuses on early intervention, prevention, and reducing barriers to care within the school setting. L.A. Care's participation is in collaborative partnership with Health Net, Los Angeles County Department of Mental Health, and the Los Angeles County Office of Education (LACOE).

Thus far, we have met all program milestones from initial planning and engagement to service delivery expansion and monitoring and reporting. We have been awarded 75% of DHCS' available funding to date, and we are currently on target to meet our goal of reaching 100% funding by the end of the calendar year.

Hazel Health has partnered with applicable schools and school districts to provide students with access to telehealth services for mental health care, including counseling and therapy sessions, in the school environment or remotely. 53 Local Education Agencies (LEAs) with 675 schools total are currently referring members for BH services though Hazel Health. The majority of referrals come from school staff (84%) and the remaining 16% come from self-referrals from students.

Lastly, in the Children and Youth Behavioral Health Inititive (CYBHI), there was an update to the school behavioral health fee schedule. Carelon Behavioral Health has been selected by DHCS as the Third Party Administrator (TPA) for CYBHI. L.A. Care already has an established working relationship with Carelon, which should help implement the new process for this initiative, including using the same process for payments that is currently established.

Housing Initiatives

Housing CS, Day Habilitation CS, Field Medicine, HHIP

Housing (Housing Navigation CS, Tenancy Sustaining Services CS, Housing Deposits CS):

Member enrollment and network: As of August 12, 12,914 members were enrolled in L.A. Care's housing programs, of which 9,338 were assigned to DHS. This is a 24% increase in enrollment (2,517 additional members) from the beginning of the year.

Field and Street Medicine: Launch and Operations

After the Request for Applications (RFA) was distributed in April, resulting in 20 submissions, final provider selection letters were distributed to 19 qualifying organizations on July 10, 2024. Final coverage areas were including in the selection letter, and the L.A. map and participating providers were also shared. Of these providers, ten organizations were selected to receive capacity-building funds to set up new Field Medicine teams based on coverage in each region. The investment agreement is being finalized and will include specific metrics the organization will report.

Pharmacy Department

Medication Adherence Programs

Comprehensive Adherence Solutions Program (CASP): Since 2023, we have implemented several new interventions and enhancements. These efforts include expanding collaboration to 19 Participating Physician Groups (PPGs), deploying the Navitus RISE Customer Relationship Management (CRM) solution to facilitate timely member identification and engagement, partnering with AdhereHealth for additional adherence outreach, and collaborating with our Advanced Analytics Lab (AAL) to utilize predictive analytics for improved member prioritization and outreach. We have increased member calls, set new monitoring targets, and introduced weekly interactive customer service training for our staff. We are closely monitoring our performance and remain committed to improving adherence rates.

Pharmaco-adherence Mailers: Internally managing mailer distribution for DSNP and LACC/D members and providers is expected to yield cost savings of approximately \$154,000, starting in June 2024. As of August 15, a total of 536 DSNP and 625 LACC provider mailers have been sent out, along with 1,925 DSNP and 8,521 LACC member mailers. Pharmacy is also working on deploying a faxing workflow through Retrarus WebExpress, as a low-cost supplemental form of communication with providers.

mPulse Mobile Inc. Text Campaigns: Pharmacy has launched two new text message campaigns on July 7, 2024 to further support the medication adherence measures. These text campaigns focus on reminding members that they are overdue for a medication refill and have an interactive feature that allows members to inform us that they would like 100-day supplies of their medications. The text messages will reduce member fatigue from calls and as of August 12, 932 members have already expressed interest in receiving a 100-day supply of their medications.

Refill Reminder Robocalls: Pharmacy has been collaborating with our Customer Solutions Center (CSC) to relaunch the refill reminder robocalls on July 22, 2024. The robocall logic was updated to identify and call members who are overdue for a medication refill, rather than those with an upcoming refill, to reduce member abrasion. As of August 19, 761 total robocall attempts have been made to DSNP and LACC members. Of these, 277 calls successfully connected with the members.

AdhereHealth Vendor Collaboration: Pharmacy started a new collaboration with AdhereHealth to engage members in medication adherence. This program focuses on non-adherent and unengaged high-risk members. Medication adherence outreach to the first cohort of members started on July 31, 2024.

Medication Therapy Management (MTM) Program

CMS requires health plans to offer MTM services to Medicare members, including an annual comprehensive medication review (CMR). L.A. Care's MTM submission for program year 2025 was approved. The 2024 MTM program year has started and changes to the program are reflected on our website. L.A. Care Pharmacy, in collaboration with Navitus Clinical Engagement Center (MTM vendor), has achieved a 66% completion rate of eligible members as of August 12, 2024, a significant improvement from 2023 Q3 at 61%.

Additional Pharmacy Programs

Asthma Medication Ratio (AMR):

The AMR measure assess members 5-64 years of age who were identified as having persistent asthma and had a ratio of controller medications to total asthma medications of 0.50 or greater during the measurement year. This is important as appropriate medication management for members with asthma could reduce the need for rescue medication – and prevent ER visits, inpatient admissions and missed days of work or school.

The Pharmacy Data Analytics team worked with Quality Performance Management to create an updated National Drug Code (NDC) list that would positively impact AMR performance, contingent on auditor approval. Additionally, prescribers of non-compliant members with a short-

Medication requires PA

Pharmacy runs Ra

acting beta agonist (SABA) prescription will be faxed a general notice to prescribe inhaled corticosteroid (ICS)-formoterol as the preferred reliever therapy per clinical guidelines.

PA Accel: This is automated prior authorization (PA) program, which operates at the point of sale by utilizing member's medical and pharmacy data. Medications requiring prior authorization may approve seamlessly at the pharmacy if criteria are met. The program went into production on May 14, 2024 for our DSNP line of business and is now also currently rolled out for LACC and PASC. In the month of July, 330 requests were approved through PA Accel, reducing the need for Prior Authorizations by 45%.

DOWNSIDE Original PA Process: Time-Consuming and Resource Intensive Before The PA review process includes many intermediary manual steps before a decision is made Member returns Rx-receives rejection "PA Eligibility checks submits ePA/PA notified of to pharmacy to requires PA Request form validation to Navitus (PBM) fill medication Claims history review Formulary status check After On the Fast Track with PA Accel BENEFITS

PA Accel pulls in medical

and pharmacy data to adjudicate claim

Figure 1. Benefits of the PA Accel program as compared to the original PA process.

Driving improvement in: * Compliance Risk * Member + Provider

Medication Adherence

ication immediately at

the pharmacy

Compliance & Quality Committee (C&Q) Meeting



Compliance Department September 19, 2024

Chief Compliance Officer Report Out

Todd Gower

Chief Compliance Report & Agenda

- 1. Compliance Report Out from Internal Compliance Committee "ICC" (Todd Gower)
- 2. Enterprise Risk Assessment Management Action Plan Updates
 - Vendor Management (Michael Sobetzko and David Inglese)
- 3. Issues Inventory (Michael Sobetzko)
- 4. Business Unit Report Out Appeal and Grievance (Demetra Crandall)

2024 Enterprise Risk Assessment Management Action Plans ("MAPs")

Mike Sobetzko & Business Unit Management Owners

Vendor Management and Contracting Process

September Risk Committee. Vendor Risk Management policy draft is

being circulated. Initial vendor data gathering in process

Presenter(s): Michael Sobetzko & David Inglese

DICK DECCDIDITION AND ACTIVITY

	RISK DESCRIPTION AND ACTIVITY	SIAIUS	DATE	END DATE							
	Risk Description: Lack of cross functional third-party vendor management and oversight. How to ensure vendors adhere to contractual requirements. Complexed contracting process, multiple touches across organization, contracting may be delayed in certain parts of process. Centralized owner that works cross functionally with business partners.										
Vendor Management and Contracting Process Remediation Plan and Timeline											
	End to End process currently being assessed with 3rd party consultant	Complete		Q3 2024							
	Leadership review of the contracting process assessment. Evaluation of recommendations to understand what will be implemented	In Progress		Q2 2025							
	Procurement Council	In Progress		Q4 2024							
	Risk Management Process formalized	In Progress		Q4 2024							
	Vendor Risk Committee charter to be presented for approval at	In Progress	7/24	Q4 2024							

Issues Inventory

Michael Sobetzko

Issues Inventory Update – Summary

Status	Dec- 23	Jan- 24	Feb- 24	Mar- 24	Apr- 24	May- 24	Jun- 24	Jul- 24	Aug- 24	Sep- 24	Oct- 24	Nov- 24	Dec- 24
Reported	5	6	7	10	4	6	27	5					
Open	2	4	1	2	1	1		4 (+4)					
Closed to inventory	1		2	3	2	3							
Deferred													
Remediated		1	3	1									
Tracking Only	2	1	1	4	1	2	27	1 (+1)					
Monitoring Only													

- Open Issues confirmed by Compliance Risk Operations that require oversight and monitoring with business units.
- Closed to Inventory Issues in which business units' are seeking guidance about a regulation or best practice process.
- **Deferred** Issues in which regulatory guidance (DHCS, DMHC, or CMS) is pending to resolve or issue resolution is dependent on another business units' implementation of a system or process.
- Remediated Issues that require formal or informal corrective action plans for resolution.
- **Tracking Only** Issues managed by other Compliance areas (such as Regulatory Affairs, Audits, Analysis, Communication and Internal Audit In which the risk management staff is following up for current status updates to closure.
- Monitoring Only Issues in which corrective action plans are completed and monitoring is to be done by Compliance.

Issues Inventory Years 2019 - 2024

OPENDEFERREDTRACKING ONLY

Year	2019	2020	2021	2022	2023	2024
Total	6	134	32	105	212	65 (+5)
Open				2	15	9(+4)
Closed to Inventory					126	16
Deferred			3	21	2	
Remediated	6	134	29	82	50	5
Tracking Only					19	35 ⁽⁺¹⁾
Monitoring Only						

Issues Inventory Update - Open

Issue Name and Description	Date Reported	Business Unit	Status
DSNP 2025 eForms	7/31/2024	Enrollment Services	Open
L.A. Care is investigating regulatory process to address the outbound/834 files to the Participating Provider Groups (PPG) or Plan Partners that supply them the new Sexual Orientation and Gender Identity (SOGI) information or Relationship to Enrollee information that we will now receive from CMS in our 834 files. (1608)			
Covered California Transparency in Coverage Status Report	7/31/2024	Commercial Product	Open
L.A. Care is at risk for not meeting the delivery date for the LACC report to Covered California and requested an extension. (1607)			
* This issues was remediated in September 2024			
DSNP Special Supplemental Benefit for the Chronically ILL Decommission 2025	7/30/2024	Appeals & Grievances	Open
Investigating the process in place to address members impact by the de-commissioning of D-SNP Special Supplemental Benefit for the Chronically ILL in 2025.(1606)			
* This issue was remediated in August 2024			
Navitus Not In Compliance AB352	7/26/2024	Pharmacy	Open
Navitus is non-compliant with AB 352 requirements surrounding out-of-state data transmissions and their ability to identify diagnoses during pharmacy claims			
adjudication.(1605)			38

Issues Inventory Update – Tracking Only

Issue Name and Description	Date Reported	Business Unit
Plan Partner Anthem Non-Timely Authorizations	7/11/2024	Utilization Management
The Department of Health Care Services (DHCS) informed L.A.Care that plan partner Anthem has been non-compliant with authorizations processing timeliness specifically Skilled Nursing Facilities. (1604)		

Appeal and Grievance Report Out

Demetra Crandall

Appeal Volume JUL 23 - JUN 24

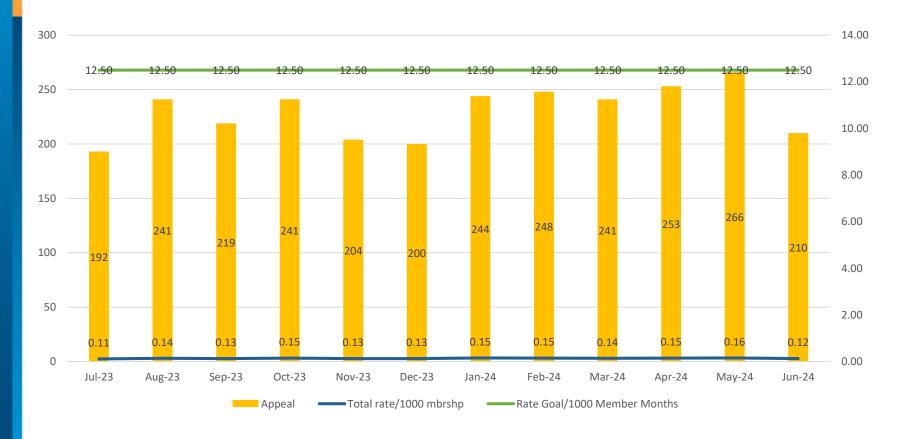
Monthly Appeals Report: Detailed Appeals Data Reporting Period: Jul 2023 - Jun 2024

Note: Cells highlighted green indicate highest volume Appeals categories/subcategories for the report month.



Month Over Month Appeals Volume Detail												
Annania Catanani	Report Month											
Appeals Category	Jul-23	Jul-23 Aug-23 Sep-23 Oct-23 Nov-23 Dec-23 Jan-24 Feb-24 Mar-24 Apr-24 May-24 Jun-24										
Access	186	222	210	229	196	164	214	218	232	236	258	199
Billing and Financial Issues	5	16	8	7	7	33	28	24	6	12	7	9
Quality of Care	1	1 3 1 5 1 3 2 6 3 5 1 2										
Total	192	241	219	241	204	200	244	248	241	253	266	210

Appeal Volume JUL 23 - JUN 24



Grievance Volume JUL 23 - JUN 24

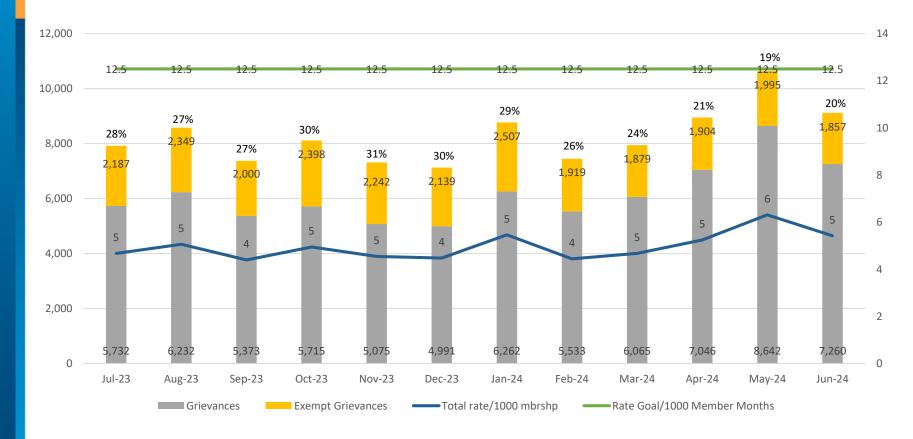
Monthly Grievances Report: Detailed Grievances Data Reporting Period: Jul 2023 - Jun 2024

Note: Cells highlighted green indicate top 3 highest volume grievance categories/subcategories for the report month.

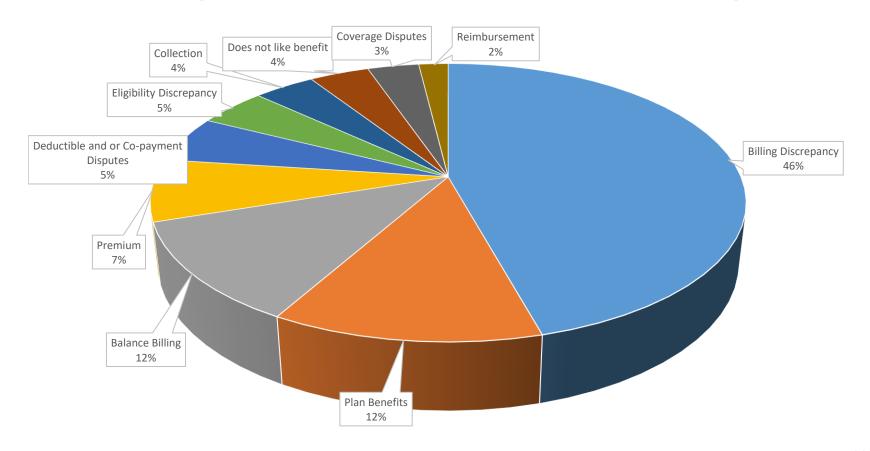


Month Over Month Grievance Volume Detail													
Grievance Category		Report Month											
Grievance Calegory	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	
Access	2,565	2,693	2,324	2,592	2,297	2,285	2,670	2,106	2,472	2,740	3,282	2,750	
Attitude and Service	2,413	2,399	2,154	2,340	2,260	2,165	2,598	2,394	2,469	2,634	3,491	2,810	
Billing and Financial Issues	2,495	2,933	2,391	2,716	2,417	2,369	3,029	2,534	2,529	2,984	3,252	3,051	
Quality of Care	431	540	494	447	335	306	458	410	462	574	587	486	
Quality of Practitioner Office Site	15	16	10	18	8	5	14	8	12	18	25	20	
Total	7,919	8,581	7,373	8,113	7,317	7,130	8,769	7,452	7,944	8,950	10,637	9,117	

Grievance Volume JUL 23 - JUN 24



Qtr2 Billing & Financial Top 10 Sub-Categories



A&G Initiatives

A&G System Updates



□ A&G is in the process of implementing a new system, i3vertical/Kiriworks. The goal is to have improved data reporting and compliance visibility. The new system implementation date is slated for 2025.

Questions??



L.A. Care Health Plan Board of Governors Compliance & Quality Committee

CHARTER

I. General.

The Compliance & Quality Committee ("(the committee" Committee") of the L.A. Care Health Plan Board of Governors ("(the board") "Board") shall assist the Board in fulfilling its oversight responsibilities concerning the review of L.A. Care Health Plan's compliance with applicable federal and state laws and regulations, policies relating to healthcare-related regulatory compliance and quality issues, and the delivery of quality medical care to the members it serves.

The Committee shall be comprised of Board members, none of whom is an employee of L.A. Care Health Plan. -The number of Committee members shall be determined by the Board.- Committee members should be independent of management and free of any relationship that, in the opinion of the Board, would interfere with the exercise of independent judgment as a Committee member.

The Committee shall elect one of its members to act as Chairperson of the Committee. The Chairperson shall preside at each Committee meeting. The Chairperson, in consultation with the other Committee members, shall set the agenda of items to be addressed at each meeting.

The Committee shall meet at least four times annually quarterly and more frequently, as necessary.—It shall make recommendations to the Board periodically, in consultation with the Chief Executive Officer ("CEO") or histheir designee, and the Chief Compliance Officer of Regulatory Affairs & Compliance, ("CCO"), and the Chief Medical Officer ("CMO") on those findings and matters within the scope of its responsibility. The The CCO leads the Compliance Program and reports directly to the CEO and the Committee shall maintain minutes of all its meetings to document its activities and recommendations.—The CMO leads the Quality Program and reports directly to the CEO and the Committee.

L.A. Care Health Plan's compliance framework is informed by the Seven Elements of an Effective Compliance Program, as set forth by the Office of Inspector General ("OIG") of the U.S. Department of Health and Human Services ("HHS"). As indicated in L.A. Care Health Plan's Compliance Program, the Committee shall comply with OIG requirements and guidance, and compliance reports will be aligned with OIG guidance.

II. Committee Goals.

The Committee is committed to helping L.A. Care Health Plan achieve its mission to provide access to quality health care for Los Angeles County's vulnerable and low-income communities and residents and to support the safety net required to achieve that purpose. To that end, the Committee's goal is to foster a culture that strives to enhance L.A. Care Health Plan's value to members and its employees, health care providers, and all other entities with which L.A. Care Health Plan has contracted or subcontracted. The Committee envisions a culture where everyone involved understands compliance and acts to maximize the prevention, detection, reporting, and resolution of all instances of noncompliance. The Committee aspires to a culture that values quality and promotes continuous

quality improvement related to member health care and service at all levels, both inside and outside L.A. Care Health Plan. The primary goals of the Committee are to:

- 1. Monitor and oversee the quality management of L.A. Care Health Plan, its planPlan Partners, and any contracted or subcontracted entities.
- 2. Assist the Board in fulfilling its fiduciary responsibilities relating to L.A. Care Health Plan's legal and financial compliance with applicable laws, regulatory requirements, industry guidelines, and policies;
- 3. Ensure that all applicable solvency standards are met with respect to L.A. Care Health Plan's Plan Partners and any contracted or subcontracted entities;
- 4. Monitor the solvency and claims payment timeliness of any organization that is contracted or sub-contracted with L.A. Care Health Plan; and
- 5. Provide a vehicle for communication between the Board and management of L.A. Care Health Plan to ensure proper operations and performance of L.A. Care Health Plan and its stakeholders. its Plan Partners, and any contracted or subcontracted entities.

III. *Committee Responsibilities.*

The responsibilities of the Committee, on behalf of the Board, shall include:

- 1. Ensuring L.A. Care Health Plan –adopts and monitors the implementation of policies and procedures and performance standards that require L.A. Care Health Plan and its employees, theits Plan Partners, and the providers to act in full compliance with all applicable laws, regulations, and contractual requirements; and.
- Receiving and reviewing information necessary to understand L.A. Care Health Plan's
 compliance risks, including receiving and reviewing policies and procedures and other
 compliance-related documents.
- 2.3. Maintaining communication between the Board, the internal or external compliance auditors, and management of L.A. Care Health Plan.
- 3.4. Ensuring that L.A. Care Health Plan addresses and reviews matters concerning or relating to L.A. Care Health Plan's Compliance Program and Plan Partner performance.

IV. Committee Duties.

In carrying out its responsibilities, the Compliance & Quality Committee shall include, but not limit performance of its duties; to, the following:

Compliance General Duties:

Committee members are encouraged to ask questions and relate concerns about any matter they believe relates to the compliance and quality responsibilities of the Board.

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Compliance Duties

- 1. Provide oversight of the implementation—and, continuance, and effectiveness of L.A. Care Health Plan's Compliance Program (and recommend any revisions thereto, as appropriate) relating to the conduct of business to ensure adherence to L.A. Care Health Plan's Compliance Program policies, the Code of Conduct, governmental rules, regulations—and contractual agreements, and contractual agreements. Committee members must remain aware that such oversight extends to all other entities with which L.A. Care Health Plan has contracted or subcontracted, as applicable.
- 2. Ensure that L.A. Care Health Plan's Ensure that L.A. Care Health Plan has in place policies and procedures, reporting systems, and programs to provide reasonable assurance that: (a) the operations of L.A. Care Health Plan comply with all applicable federal and state laws and regulations; (b) L.A. Care Health Plan ensures the delivery of quality medical care to its members and promotes member safety; and (c) L.A. Care Health Plan is addressing its regulatory-extended obligations (for compliance and quality accountability) to its providers and vendors.
- 2.3. Ensure that L.A. Care Health Plan's mission, values, and Code of Conduct are properly communicated to all employees on an annual basis.
- 4. Review, revise as necessary, Execute the authority delegated by the Board to the Committee to review and recommend approval, at least annually, of approve biennially the Code of Conduct.
- 5. Review and submit it to approve a biennial assessment of compliance. The scope will be based on fulfilling the requirements of an effective compliance program. This must be conducted by a 3rd Party and or L.A. Care Audit Services.
- 3.6. Receive reports from the CCO about reportable items from L.A. Care Health Plan's Board for approvalInternal Compliance Committee.
- 7. Report at least quarterly to the Board, and as requested by the Board, on its activities, findings, and any recommendations it may have related to the duties delegated to the Committee.
- 4.8. Present to L.A. Care Health Plan's Board, as appropriate, such measures and recommend such actions as may be necessary or desirable to assist L.A. Care Health Plan in conducting its activities in full compliance with all applicable laws, regulations, contractual requirements, policies, performance standards, and L.A. Care Health Plan's Code of Conduct. Further, the Committee shall present to the Board, as appropriate, recommendations to establish policies and procedures and performance standards.
- 9. Receive annual reports on the completeness and timeliness of employee training, the effectiveness of L.A. Care Health Plan's education and training programs, and the challenges associated with the education and training programs.
- 5.10. Regularly review reports to assess and monitor the operational performance of each of the Plan Partners to ensure they maintain the standards and requirements set forth in their contracts with L.A. Care Health Plan and set forth in all other applicable laws, procedures, and standards.

- 6.11. Make recommendations to the full Board to impose appropriate sanctions, extend or renew contracts, establish policies, procedures and performance standards, impose additional conditions of participation, and review corrective action plans for any organization that is either directly or indirectly contracted with L.A. Care Health Plan.
- 7.12. Serve as a hearing committee in connection with recommendations to impose sanctions on any individual or organization that is either directly or indirectly contracted with L.A. Care Health Plan, if required under applicable law or L.A. Care Health Plan's policies and procedures.
- 13. Require management to do the following: conduct audits on healthcare-related compliance, regulatory, or legal concerns and, where appropriate, direct management to provide the results of such audits directly to the Committee or Board; commission such other studies, analyses, reviews, or surveys it deems appropriate to ensure L.A. Care Health Plan's compliance with healthcare-related regulatory requirements; and evaluate the quality of the personnel, committees, and entities providing healthcare-related compliance and regulatory services for L.A. Care Health Plan, subject to the procurement policies and the Board's approval.
- 14. Receive reports of material and substantiated concerns that one or more entities is not complying with applicable laws or regulations related to compliance, payment integrity, patient safety, or the quality of patient care. Such concerns may include subpoenas, search warrants, or similar requests to L.A. Care Health Plan from the United States Department of Justice ("DOJ"), HHS, the Department of Health Care Services ("DHCS"), or any State Attorney General, or external complaints such as qui tam actions.
- 15. Receive from staff transparent reporting on material enforcement matters and, upon request, access to communications from monitors and/or consultants required under the enforcement matter.
- 16. Receive reports of investigations that are occurring, including findings as they become available, mitigation and remedial measures, and the implementation of such mitigation and remedial measures.

Monitoring & Audit Duties:

- 1. Provide sufficient opportunity for the Compliance OfficerCCO and leader of Internal Audits to meet with the Compliance & Quality Committee to provide the Committee with appropriate evaluations of L.A. Care Health PlanPlan's Plan Partners' and other contracted or subcontracted entities' compliance with legal, regulatory, and financial solvency standards.
- 2. Provide oversight of the internal compliance audit functions of L.A. Care Health Plan and external compliance audit functions in connection with the Plan Partners and those entities for which L.A. Care Health Plan has oversight responsibilities, including reporting obligations, the proposed annual audit plans, and the coordination of such plans.
- 3. Receive and review, as appropriate, reports on compliance issues and risks including but not limited to: compliance and quality; exclusion and sanction monitoring; concerns or cases of

fraud, waste, and abuse; internal and external audit results; clinical risk; patient safety and privacy; operational performance; and corrective action plans and performance improvement. The CCO and CMO will provide, at a minimum, quarterly written reports. For additional Committee meetings, the CCO and CMO (or their approved designee(s)) may provide an oral or written report.

4. Receive in-person reports from any of L.A. Care Health Plan's officers or their designee(s); employees of L.A. Care Health Plan or any other entity with which L.A. Care Health Plan has contracted or subcontracted; or any representative of outside legal, accounting, or other advisors. The Committee, or the Chairperson on behalf of the Committee, may request any of these individuals to attend a Committee meeting. The Committee may request and meet privately with any officer or employee of L.A. Care Health Plan.

Quality Assurance Duties:

- 1. Provide oversight of the quality management activities of L.A. Care Health Plan and its contracted <u>and subcontracted</u> entities <u>including</u>. Such oversight includes review of the <u>QMQuality Management</u> Program, monitoring activities, corrective action plans, and improvement activities.
- 2. Quality Improvement Plan (QIP) and the QIP Annual Work Plan for submission to L.A. Care Health Plan's Board of Governors for approval.
- 2. Execute the authority delegated by the Board to the Compliance & Quality Committee to review and approve the following annual—Quality Improvement (("QI)—and"), Utilization Management (("UM)"), Compliance, and Internal Audit program documents:
 - QI Program Document
 - Annual QI Workplan
 - QI-Annual QI Report/Evaluation
 - Annual UM Program Document
 - Annual UM Annual Report/Evaluation
 - Annual Compliance Program Report/Evaluation
 - Annual Compliance Program Workplan
 - Biennial Internal Audit Assessment
 - Annual Internal and External Audit Plans

Executive summaries, with key findings and highlights from the documents, shall be submitted to the Board for its information and pursuant to requirements by the State Department of Health Services DHCS and other regulatory bodies.

- 3. Receive periodic reports from the Chief Medical Officer and the Quality Assurance/Quality Improvement Committee
- 3. Receive and review data provided by Centers for Medicare and Medicaid Services ("CMS") to compare L.A. Care Health Plan's quality performance with CMS standards and requirements.

Page 6	of 6
<u>General</u>	<u>Duties:</u>
Perform	n other duties as assigned by the Board of Governors.
<u>Amendm</u>	nent of the Compliance and Quality Committee Charter
At a mi	nimum, on a biennial basis, the Committee shall review the Committee Charter, make changes
	ed, and approve the amended Charter. The Committee shall then forward it to the Board for
	ll. Any amendment must be reported and disclosed as required by and in accordance with
<u>applicat</u>	ble laws, rules, and regulations.
Reviewe	ed and Approved by:
L.A. Ca	re Health Plan
	f Governors
John Ra	offoul, Board Secretary
Date: —	



Quality Improvement and Health Equity Committee (QIHEC)

Summary Report for Compliance & Quality Committee





Member and Community Focused

Field Based Health Equity and

Health Care Promotional Activities

HEALTH EQUITY TEAM HELD A GUN VIOLENCE AWARENESS PANEL AT THE LYNWOOD AND WILMINGTON CRC: 163-GUN LOCKS DISTRIBUTED



ON JUNE 27, THE HEALTH EQUITY TEAM HELD WALK AND TALK WITH A DOC AT WILMINGTON WATERFRONT PARK DURING CAMP CRC.

Community members exercised, deepened their health knowledge, and connected with valuable resources.







SUMMARY OF KEY EQUITY AND DISPARITIES FINDINGS AND PROGRAM FOCUS AND INTERVENTIONS

- Disparities in clinical outcomes persist across various domains and populations
 - One of the main priority is focused on improving the child health measures with Black/African American children and youth in Service Planning Area 6 (South LA).
 - Community Health Workers provide assistance with scheduling well-child visits before the 15-month mark
 - Colorectal cancer screening is low across all lines of business
 - Offering at-home test kits

- Conducted member survey in text message campaign
 - Majority of members stated they did not see their doctor due to not feeling sick or not knowing who their doctor is.

Quality Improvement with Data and Getting More Data

Data Acquisition

Scouring and scrubbing claims, encounters and supplemental data.

Demographic Updates

 Addressing the new Office of Management and Budget race/ethnicity changes in our system and talking with key community stakeholders (LAC DPH)

Correct and Updated Contact Information

- Exploring alternative databases with member contact information.
- Working with enrollment services to continue to update and ensure that we have the accurate member contact information

Additional Work Planned

- Developing a disparities data dashboards to better identify disparities.
- Utilizing member councils and health promotoras for feedback on member outreach materials and programs
- Empowering provider groups and clinics to analyze data and identify disparities in patient populations
- Increasing the number of languages available for member outreach
- Collaborating with community-based organizations and vendors in developing culturally tailored materials for a diverse membership

• Informational: Universal Provider Manual (UPM) Updates

- Legally binding document and serves as an extension of L.A. Care's contract with our network providers.
- Updated on a regular cadence and posted on our website.
- The Communications team seeks QIHEC input for the UPM on an annual basis.

Questions



Timely Access to Care Update: MY2023 Survey Results Compliance & Quality Committee



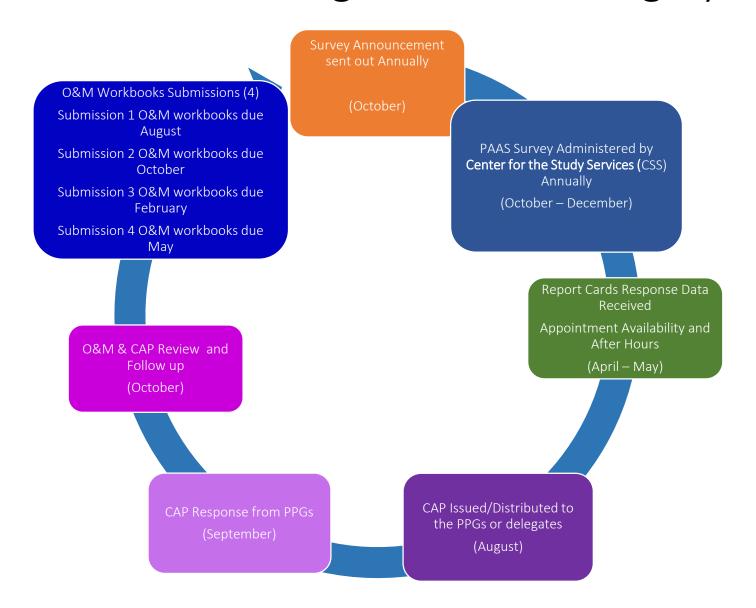
Priscilla Lopez Manager, Quality Improvement Accreditation September 19, 2024



Agenda:

- 1. Performance Goals
 - a) Oversight & Monitoring Cycle
 - b) Overview
- 2. MY2023 Performance by PPGs, Plan Partners, and Direct Network
 - i. Primary care providers
 - ii. Specialty care providers
 - iii. After Hours Care
- 3. Low-Performance Deep Dive:
 - 1. PPGs
 - 2. Medi-Cal, Plan Partners, and Direct Network
- 4. Interventions
- 5. Discussion and Feedback

Provider Appointment Availability Survey After Hours Oversight & Monitoring Cycle



Access to Care: Performance Goals

QI-030 Policy: Assessment of Appropriate Access to Covered Services

QI will calculate performance goals annually for each Appointment Availability and After-Hours Access standard for all lines of business. The calculation will be determined by establishing a goal where L.A. Care achieves statistically significant improvement over the prior year's results. Exception: **Goals will always be set to a minimum 80% compliance rate.**

- 1.1 The starting point is the rate and sample size from the prior year
- **1.2** It is assumed that the sample size is the same for the current year and that the goal rate demonstrates a statistically significant improvement from the prior year
- **1.3** Statistical significance is determined using a two-tailed z-test of proportions where the critical alpha is .05

Performance by PPGs, Plan Partners, and Direct Network

Access to Care: MY 2023 Performance

	MY 2023 L.A. Care Medi-Cal Compliance Rate	L.A. Care's Performance Goal	Variance
Primary Care			
Urgent	73%	80%	-7%
Routine	85%	89%	-4%
Preventive (Adult)	95%	97%	-2%
Preventive (Child)	90%	93%	-3%
Prenatal	96%	98%	-2%
n-Office Waiting	99%	99%	0%
Call Back	65%	80%	-15%
Reschedule	95%	99%	-4%
No Show Process	99%	96%	+3%
Specialist			
Jrgent	69%	80%	-11%
Routine	75%	80%	-5%
Prenatal	100%	96%	+4%
n-Office Waiting	96%	97%	-1%
Call Back	57%	80%	-23%
Reschedule	88%	91%	-3%
No Show Process	97%	99%	-2%
After Hours			
Access – ER	88%	80%	+8%
Access – Reach	81%	80%	+1%
Fimeliness	66%	80%	-14%

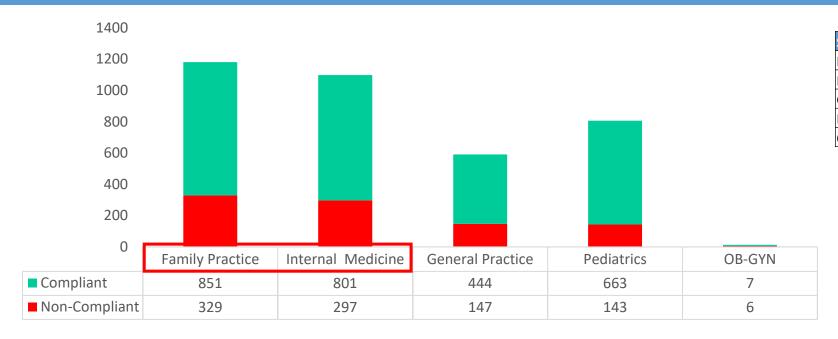
6% or more below the goal
Within 5% +/- from goal
6% or more above the goal

MY 2023 Access to Care Survey Results

Availability & After Hour Survey Results																			
by PPG/Plan Partner/Direct Network • CAP History				_	Primary C					Specialist					lfter Ho				
PPG, Plan Partner, Direct Network	Urgent	Dankin	Adult Preventive				Call Basis	l maraka dala	No Okam Danasa										
L.A. Care GOAL	80%	89%	97%	93%	98%	99%	80%	99%	96%	Urgent 80%	80%	96%	98%	80%	90%	99%	80%	80%	80%
Adventist Health Physicians Network	83%		100%	84%	100%	100%	35%			442	74%	NR	100%	44%	95%		38%	100%	98%
Allied Pacific	84%			97%	100%	38%	66%		98%	67%	762	NR.	36%	58%			88%	88%	
Altamed Health Network Inc	76%	89%		88%	34%	97%	59%		99%		80%	NR	95%	53%		98%	89%	79%	72% 68%
Altamed Health Services	77%	89%		88%	942	97%	58%		99%		80%	NR	95%	52%		982	90%	79%	69%
Angeles IPA	81%			98%	100%	100%	68%		100%	71%	83%	NR	36%	55%	96%	0.01	86%	92%	78%
Anthem	79%	92%		94%		98%	63%		99%	60%	642	NR	94%	47%			89%	87%	71%
Blue Shield	73%			87%		98%	60%		98%	64%	69%	NB	95%	49%		97%	89%	80%	68%
Carelon Behavioral Health (Bi-Annual, Sub 2 &	84%		N/A	N/A		99%	69%		99%		90%	NR	99%	67%	97%	100%	N/A	_	N/A
Citrus Valley Physicians Group	92%			91%	100%	98%	78%		98%	62%	73%	NR	99%	45%			94%	87%	70%
Community Family Care	72%	89%		90%	100%	98%	57%		98%		73%	NB	95%	66%	91%	100%	95%	91%	82%
Exceptional Care Medical Group	94%	_		97%	100%	95%	74%		97%	71%	78%	100%	98%	62%	93%	97%	91%	84%	68%
Heritage: High Desert Medical Group	33%		100%	80%	NR	100%	67%		100%	78%	78%	NR	100%	72%		100%	100%	85%	85%
Heritage: Lakeside Medical Group	79%	93%		94%		99%	65%		99%	71%	74%	100%	98%	56%		99%	93%	88%	72%
Heritage: Regal Medical Group	80%	93%	97%	94%	96%	99%	66%		99%		78%	100%	98%	53%		98%	92%	88%	72%
Heritage: Sierra Medical Group	100%		100%	100%	100%	100%	100%	100%			100%	NR	100%	29%	100%	100%	91%	91%	91%
L.A. Care Direct Network	78%	94%	100%	94%	100%	99%	68%	95%	98%		78%	100%	96%	57%	90%	98%	93%	88%	76%
L.A. County Department of Health Services	52%	62%	93%	88%	100%	100%	100%	100%	100%	99%	99%		100%	100%		100%	100%	64%	54%
MemorialCare Select Health Plan	81%	96%	100%	100%	93%	98%	76%	88%	100%	65%	68%	NR	89%	44%	83%	100%	84%	72%	60%
MSO-MedPoint: Bella Vista IPA	77%	96%	100%	91%	100%	100%	65%	100%	100%	75%	79%	NR	96%	48%	90%	98%	87%	93%	87%
MSO-MedPoint: El Proyecto Del Barrio Inc.	40%	100%	100%	100%	100%	100%	100%	100%	100%	87%	82%	NR	100%	52%	86%	100%	91%	18%	18%
MSO-MedPoint: Family Care Specialists IPA	81%	88%	100%	100%	100%	94%	44%	93%	94%	48%	47%	NR	97%	37%	83%	97%	97%	97%	97%
MSO-MedPoint: Global Care IPA	68%	94%	100%	93%	98%	99%	66%	96%	99%	68%	84%	100%	97%	50%		99%	86%	90%	69%
MSO-MedPoint: Health Care LA, IPA	62%	83%	90%	79%	86%	100%	50%	35%	100%	70%	77%	NR	93%	51%	87%	98%	80%	83%	67%
Omnicare Medical Group (AMHN)	83%	94%	93%	34%	100%	100%	59%	93%	100%	79%	80%	NR	100%	46%	81%	100%	89%	89%	712
Omnicare Medical Group Inc	84%	94%	94%	94%	100%	100%	61%		100%	71%	81%	NR	100%	52%	82%	100%	89%	89%	69%
Optum Care Network- AppleCare Select (Bi-																			
Annual, Sub 2 & 4)	79%	91%	94%	93%	100%	98%	56%	34%	99%	65%	78%	NR	100%	69%	94%	100%	88%	89%	70%
Optum Care Network-LA Family Community (Bi-																			
Annual, Sub 2 & 4)	77%	91%	94%	91%	100%	98%	59%	93%	98%	61%	74%	NR	94%	59%	88%	100%	88%	89%	72%
Optum Health Plan of California (Bi-Annual, Sub																			
2 & 4)	71%			91%	99%	99%	60%		98%			NR	98%	54%			93%	89%	74% 70%
PIH Health Physicians	73%		100%	100%	75%	100%	64%	100%	100%	82%	85%	NR	100%	67%		100%	100%	96%	70%
Pomona Valley Medical Group	87%			91%	100%	97%	67%		100%	71%		100%	97%	58%		100%	95%	91%	71%
Preferred IPA of California	78%	95%		96%	99%	99%	66%		99%		79%	NR	97%	50%		97%	94%	90%	82%
Prospect Medical Group	75%	92%		92%	100%	99%	65%		98%		79%	100%	98%	48%	93%	95%	93%	87%	70%
Serendib Healthways Inc.	86%	_	NR	100%	100%	100%	67%	100%		67%	100%	NR	100%	33%	100%	100%	72%	59%	47%
South Atlantic Medical Group	74%	100%		100%	100%	100%	68%		100%	85%	86%		93%	67%	92%	86%	93%	93%	71%
St Vincent IPA	78%	93%		96%	91%	98%	65%		100%	78%	96%	NR	88%	68%	92%	100%	89%	83%	75%
Superior Choice Medical Group Inc.	78%	95%	97%	100%	100%	98%	73%	89%	100%	76%	76%	NR	92%	73%	82%	96%	82%	86%	66%

Lowest Performing PPGs: Timely Access Standards

Primary Care Physician – Five Lowest Performing PPGs for Urgent Care Appointment



Specialty Type	Non-Compliant	Compliant	Total
Family Practice	329	851	1,180
Internal Medicine	297	801	1,098
General Practice	147	444	591
Pediatrics	143	663	806
OB-GYN	6	7	13

Key Take Away

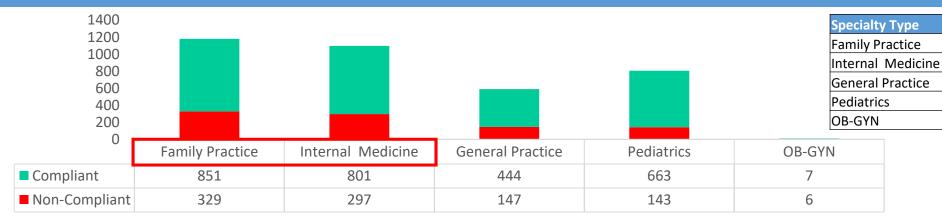
Family Practice - PPGs:

- 1. Optum Health Plan of California
- 80 / 255 providers were non-compliant
- Zip code with most non-compliant providers: 90505, Torrance
- 2. Los Angeles County Department of Health Services
- 41 / 71 providers were non-compliant
- Zip code with most non-compliant providers: 90710, Harbor City
- 3. Health Care LA IPA
- 30 / 69 providers were non-compliant
- Zip code with most non-compliant providers: 90404, Santa Monica

Internal Medicine – PPGs:

- 1. Optum Health Plan of California
- 75 / 240 providers were non-compliant
- Zip code with most non-compliant providers: 91105, Pasadena
- 2. Los Angeles County Department of Health Services
- 44 / 98 providers were non-compliant
- Zip code with most non-compliant providers: 90502, Torrance
- 3. Allied Pacific IPA
- 20 / 123 providers were non-compliant
- Zip code with most non-compliant providers: 90022, Los Angeles

Primary Care Physician (cont.) – Five Lowest Performing PPGs for Urgent Care Appointment



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Family Practice - PPGs:

- 4. Global Care IPA
- 22 / 60 providers were non-compliant
- Zip code with most non-compliant providers: 90011, Los Angeles

5. Preferred IPA of California

- 21 / 83 providers were non-compliant
- Zip code with the most non-compliant providers: 90011, Los Angeles

Internal Medicine – PPGs:

- 4. Preferred IPA of California
- 16 / 57 providers were non-compliant
- Zip codes with most non-compliant providers:

91601 & 91606, North Hollywood

91405 & 91411, Van Nuys

90301 & 90304, Inglewood

90033 & 90062, Los Angeles

5. Prospect Medical Group

- 16/58 providers were non-compliant
- Zip code with most non-compliant providers: 90301, Inglewood

Non-Compliant

Compliant

329

297

147

143

Total

1,180

1,098

591

806

13

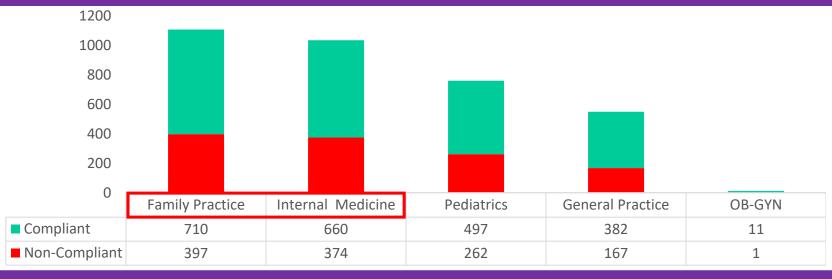
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444

663

Primary Care Physician (cont.) – Five Lowest Performing PPGs for Call Back Appointment



Zip code with most non-compliant providers: 90011, Los Angeles

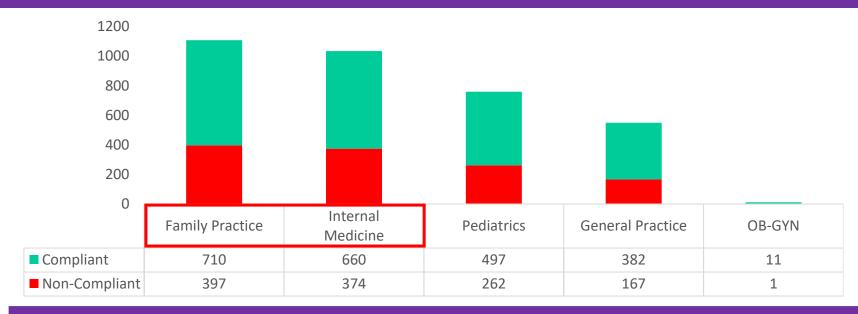
Specialty Type	Non-Compliant	Compliant	Total
Family Practice	397	710	1,107
Internal Medicine	374	660	1,034
Pediatrics	262	497	759
General Practice	167	382	549
OB-GYN	1	11	12

Zip code with most non-compliant providers: 90404, Santa Monica

Key Take Away

Family Practice – PPGs: 1. Optum Health Plan of California 91 / 225 providers were non-compliant Zip codes with most non-compliant providers: 91325, Northridge 91206, Glendale	Internal Medicine – PPGs: 1. Optum Health Plan of California 84 / 227 providers were non-compliant Zip code with most non-compliant providers: 91105, Pasadena
 2. Health Care LA IPA 32 / 62 providers were non-compliant Zip code with most non-compliant providers: 90404, Santa Monica 	 2. Allied Pacific IPA 46 / 114 providers were non-compliant Zip codes with most non-compliant providers: 91801 – Alhambra 91776 – San Gabriel 91754 – Monterey Park 91007 – Arcadia
3. Preferred IPA of California 29 / 74 providers were non-compliant	3. Prospect Medical Group 27 / 60 providers were non-compliant

Primary Care Physician (cont.) – Five Lowest Performing PPGs for Call Back Appointment



Specialty Type	Non-Compliant	Compliant	Total	
Family Practice	397	710	1,107	
Internal Medicine	374	660	1,034	
Pediatrics	262	497	759	
General Practice	167	382	549	
OB-GYN	1	11	12	

Key Take Away

Family	/ Practice —	PPGs:
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- 4. Allied Pacific IPA
- 24 / 85 providers were non-compliant
- Zip codes with most non-compliant providers:

91790, West Covina

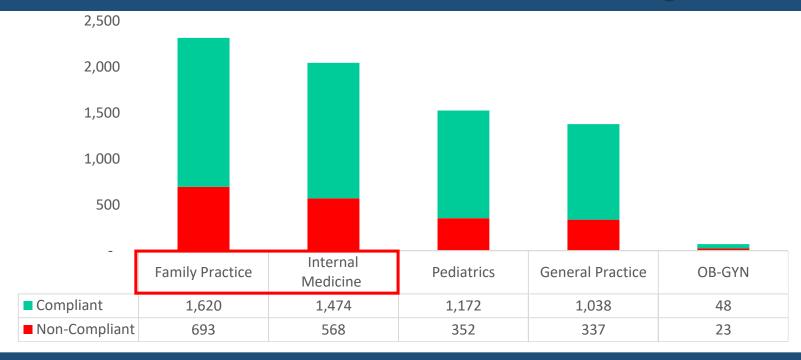
91754, Monterey Park

- 5. Optum Care Network AppleCare Select
- 22 / 46 providers were non-compliant
- Zip code with most non-compliant providers: 90011, Los Angeles

Internal Medicine – PPGs:

- 4. AltaMed Health Services
- 26 / 68 providers were non-compliant
- Zip code with most non-compliant providers: 91105, Pasadena
- 5. Preferred IPA of California
- 26 / 55 providers were non-compliant
- Zip code with most non-compliant providers: 91601, North Hollywood

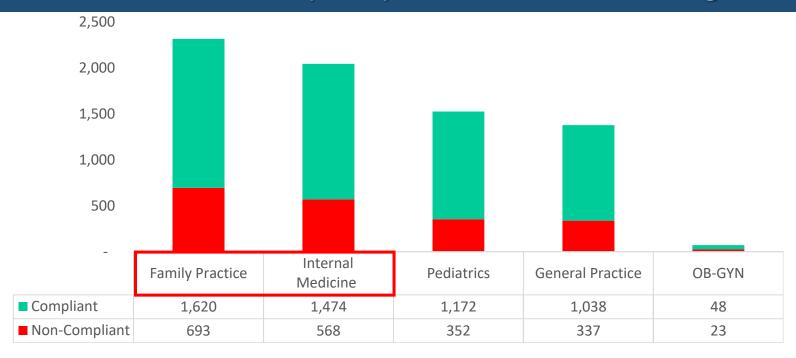
After Hours Care: Five Lowest Performing PPGs for Timeliness Compliance



Specialty Type	Non-Compliant	Compliant	Total
Family Practice	693	1,620	2,313
Internal Medicine	568	1,474	2,042
Pediatrics	352	1,172	1,524
General Practice	337	1,038	1,375
OB-GYN	23	48	71

Key Take Away			
Family Practice – PPGs: 1. Optum Health Plan of California 104 /430 providers were non-compliant Zip code with the most non-compliant providers: 90277, Los Angeles	Internal Medicine – PPGs: 1. Optum Health Plan of California 122 / 450 providers were non-compliant Zip code with the most non-compliant providers: 91105, Pasadena		
 2. Health Care LA IPA 55 / 166 providers were non-compliant Zip code with the most non-compliant providers: 90813, Los Angeles 	 2. Allied Pacific IPA 56 / 196 providers were non-compliant Zip codes with the most non-compliant providers: 91748, Rowland Heights 91007, Arcadia 		
 3. Allied Pacific IPA 54 / 163 providers were non-compliant Zip code with the most non-compliant providers: 91754, Los Angeles 	 3. Los Angeles County Department of Health Services 54 / 131 providers were non-compliant Zip code with the most non-compliant providers: 90502, Torrance 		

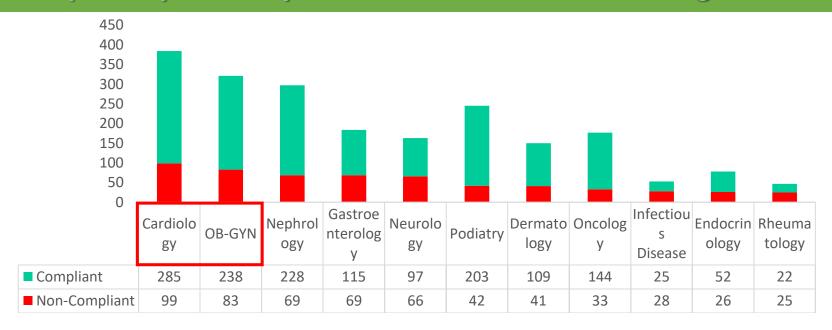
After Hours Care (cont.): Five Lowest Performing PPGs for Timeliness Compliance



Specialty Type	Non-Compliant	Compliant	Total
Family Practice	693	1,620	2,313
Internal Medicine	568	1,474	2,042
Pediatrics	352	1,172	1,524
General Practice	337	1,038	1,375
OB-GYN	23	48	71

Key Take Away			
Family Practice – PPGs: 4. Preferred IPA of California 43 / 176 providers were non-compliant Zip code with the most non-compliant providers: 90011, Los Angeles	Internal Medicine – PPGs: 4. Prospect Medical Group 32 / 115 providers were non-compliant Zip code with the most non-compliant providers: 90241, Downey		
 5. AltaMed Health Network Inc 43 / 105 providers were non-compliant Zip codes with the most non-compliant providers: 90011, 90021, 90022, 90057 & 90255, Los Angeles 	 5. Health Care LA IPA 28 /72 providers were non-compliant Zip codes with the most non-compliant providers: 91355, Valencia 90230, Culver City 90014, Los Angeles 		

Specialty Care Physician – Five Lowest Performing PPGs for Urgent Care Appointment



Specialty Type	Non-Compliant	Compliant	Total
Cardiology	99	285	384
OB-GYN	83	238	321
Nephrology	69	228	297
Gastroenterology	69	115	184
Neurology	66	97	163
Podiatry	42	203	245
Dermatology	41	109	150
Oncology	33	144	177
Infectious Disease	28	25	53
Endocrinology	26	52	78
Rheumatology	25	22	47

Key Take Away

Cardiology – PPGs:

1. L.A. Care Direct Network

- 18 / 56 providers were non-compliant
- Zip code with most non-compliant providers: 91208, Glendale

2. Allied Pacific IPA

- 10 / 22 providers were non-compliant
- Zip code with most non-compliant providers: 91105, Pasadena

3. Health Care LA IPA

- 10 / 33 providers were non-compliant
- Zip code with most non-compliant providers: 90015, Los Angeles

OB-GYN – PPGs:

- 1. L.A. Care Direct Network
- 19 / 58 providers were non-compliant
- Zip codes with most non-compliant providers: 91740, Glendora 90813 Long Beach

2. Optum Health Plan of California

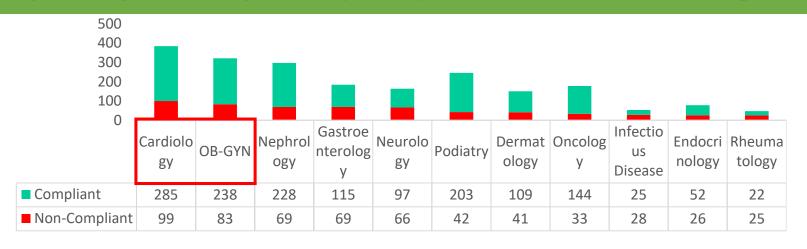
- 8 / 19 providers were non-compliant
- Zip code with most non-compliant providers: 91740, Glendora

3. Prospect Medical Group

- 8 / 25 providers were non-compliant
- Zip codes with most non-compliant providers: 90035, Los Angeles 90640, Montebello

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Specialty Care Physician (cont.): Five Lowest Performing PPGs for Urgent Care Appointment



Specialty Type	Non-Compliant	Compliant	Total
Cardiology	99	285	384
OB-GYN	83	238	321
Nephrology	69	228	297
Gastroenterology	69	115	184
Neurology	66	97	163
Podiatry	42	203	245
Dermatology	41	109	150
Oncology	33	144	177
Infectious Disease	28	25	53
Endocrinology	26		78
Rheumatology	25	22	47

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Cardiology - PPGs:

4. Global Care IPA

- 9 / 19 providers were non-compliant
- Zip codes with the most non-compliant providers:

90015, 90033 & 90017, Los Angeles

5. Prospect Medical Group

- 7 / 20 providers were non-compliant
- Zip code with the most non-compliant providers: 91801, Alhambra

OB-GYN - PPGs:

- 4. AltaMed Health Services
- 7 / 16 providers were non-compliant
- Zip codes with the most non-compliant providers:

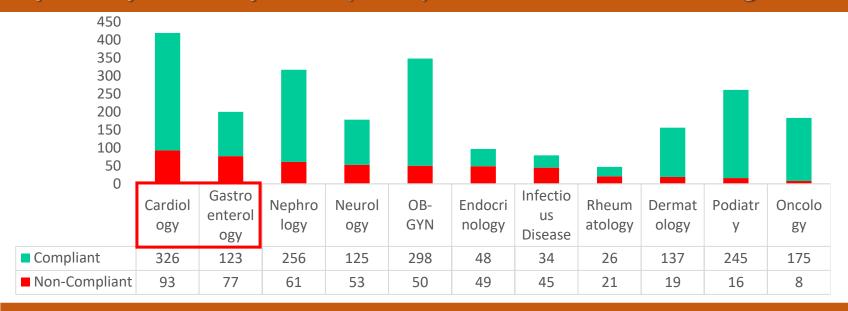
90027, 90033, 90057, Los Angeles

5. AltaMed Health Network Inc.

- 7 / 12 providers were non-compliant
- Zip codes with the most non-compliant providers:

90027, 90033 & 90057, Los Angeles

Specialty Care Physician (cont.): Five Lowest Performing PPGs for Routine Care Appointment



Specialty Type	Non-Compliant	Compliant	Total
Cardiology	93	326	419
Gastroenterology	77	123	200
Nephrology	61	256	317
Neurology	53	125	178
OB-GYN	50	298	348
Endocrinology	49	48	97
Infectious Disease	45	34	79
Rheumatology	21	26	47
Dermatology	19	137	156
Podiatry	16	245	261
Oncology	8	175	183

Key Take Away	
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Cardiology - PPGs:

- 1. L.A. Care Direct Network
- 19 / 61 providers were non-compliant
- Zip code with the most non-compliant providers: 91208, Glendale

2. Health Care LA IPA

- 10 / 35 providers were non-compliant
- Zip codes with the most non-compliant providers: 90017, 90015 & 90033, Los Angeles

Gastroenterology – PPGs:

- 1. L.A. Care Direct Network
- 13 / 28 providers were non-compliant
- Zip codes with the most non-compliant providers:

90712, Lakewood

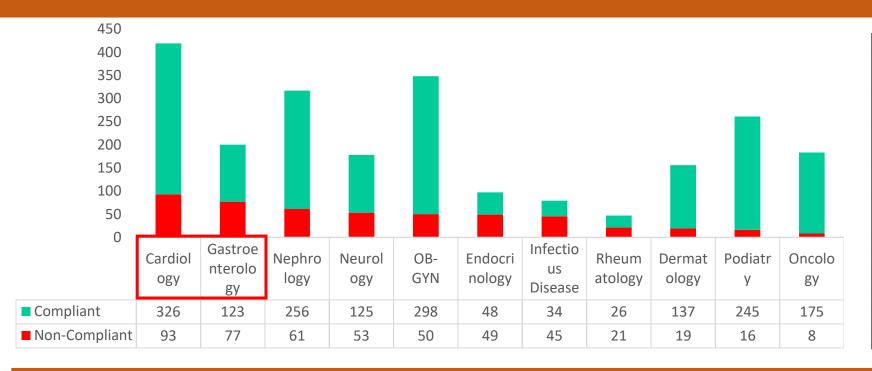
90301, Inglewood

- 2. Optum Health Plan of California
- 12 / 26 providers were non-compliant
- Zip codes with the most non-compliant providers:

90712, Lakewood

91776, San Gabriel

Specialty Care Physician (cont.) – Five Lowest Performing PPGs for Routine Care Appointment



Specialty Type	Non-Compliant	Compliant	Total
Cardiology	93	326	419
Gastroenterology	77	123	200
Nephrology	61	256	317
Neurology	53	125	178
OB-GYN	50	298	348
Endocrinology	49	48	97
Infectious Disease	45	34	79
Rheumatology	21	26	47
Dermatology	19	137	156
Podiatry	16	245	261
Oncology	8	175	183

Key Take A	way
Cardiology – PPGs: 3. Allied Pacific IPA 9 / 23 providers were non-compliant Zip code with the most non-compliant providers: 91105, Pasadena	Gastroenterology – PPGs: 3. Health Care LA IPA 6 / 14 providers were non-compliant Zip code with the most non-compliant providers: 90020, Los Angeles
 4. Prospect Medical Group 8 / 22 providers were non-compliant Zip code with the most non-compliant providers: 91801, Alhambra 	 4. Prospect Medical Group 6/ 11 providers were non-compliant Zip code with the most non-compliant providers: 90712, Lakewood
 5. Optum Health Plan of California 5 / 31 providers were non-compliant Zip code with the most non-compliant providers: 91505, Burbank 	 5. Superior Choice Medical Group 5 / 7 providers were non-compliant Zip code with the most non-compliant providers: 90020, Los Angeles

Koy Tako Away

Low Performance Analysis: Medi-Cal, Plan Partners, and Direct Network standards below the DMHC Goal of 70%

Low Performance	Appointment Availability (PCP)	Appointment Availability (SCP)	After Hour (PCP)
Medi-Cal	Call – Back Appointment: 65%	Call – Back Appointment: 57% Urgent Appointment: 69%	Timeliness Appointment: 66%
L.A. Care Direct Network	Call – Back Appointment: 69%	Call – Back Appointment: 56% Urgent Appointment (69%): 69%	NA

Low Performance	Appointment Availability (PCP)	Appointment Availability (SCP)	After Hour (PCP)
Anthem Blue Cross	Call – Back Appointment: 63%	Call – Back Appointment: 47% Urgent Appointment: 60% Routine Appointment: 64%	NA
Low Performance	Appointment Availability (PCP)	Appointment Availability (SCP)	After Hour (PCP)
Blue Shield Promise of CA	Call – Back Appointment: 60%	Call – Back Appointment: 49% Urgent Appointment (64%): 64% Routine Appointment (69%): 69%	Timeliness Appointment: 68%

Frequent Provider Group Responses for Non-Compliance

Group Responses	L.A. Care Actions
Call-Back, Urgent, & Routine Appointments:1) Providers Staff and Providers not aware of AH & AA Standards.2) Provider & Staff turnover.	 L.A. Care continuously educates provider groups on the access to care requirements via webinars, communicating standards, Corrective Action Plans, the Provider Appointment Availability Survey, and deepening collaboration during QI JOMs.
3)Providers do not have appointments available within the standard timeframe. 4) Provider and specialist offices are still experiencing delays in appointment availability due to COVID-19 office restrictions /protocols and office staff changes.	COVID-19 impacted practices tremendously and residual impacts are still being felt. Nonetheless, L.A. Care is collaborating with groups to understand more deeply the root causes beyond the public health emergency.

Interventions

Summary

- New and more extensive analytics
- Education, Training, and Provider Engagement
 - Adjusting webinar approach to include best practices and interventions
 - Coordinating with CRM to conduct outreach to non-compliant Direct Network providers
- PAAS Survey Process
 - Updating timeline to distribute survey results earlier to Provider Groups
- QI Joint Operating meetings (JOMs)
- Report Card Enhancements
- Corrective Action Enforcement
- Exploration of additional digital health, telemedicine, and technology solutions to expand access to care beyond in-person care provider visits
- Collaboration:
 - Practice transformation
 - PNM, Finance, and QI teams to address broader systemic issues including network development, contracting, reimbursement, and other systemic challenges

PCP Appointment Availability Dashboard (Example)

PCP Appointment Availability

Measure Level Compliance

•					
Measure	Ranking	Goal	2023	2022	2021
Urgent Compliance	31 of 36	80%	56%		67%
Non-Urgent Compliance	30 of 36	89%	62%		
Preventative Compliance - Adult	18 of 36	97%	76%	81%	
Preventative Compliance - Child	21 of 36	93%	75%		60%
Prenatal Compliance	1 of 36	98%	100%	100%	
Waiting Room Compliance	1 of 36	99%	100%		
Callback Compliance	30 of 36	80%	40%	41%	92%
Reschedule Callback Compliance	21 of 36	99%	89%		
Reschedule Process Compliance	14 of 36	96%	97%	100%	100%

Response Rates				
Outcome =	Count	Percentage		
Response	95	57%		
No Response	46	27%		
Refused	14	8%		
Ineligible	13	8%		



Provider Results



SCP Appointment Availability Dashboard (Example)

SCP Appointment Avialability

Measure Level Compliance					
Measure	Ranking	Goal	2023	2022	2021
Urgent Compliance	15 of 36	80%	67%	25%	75%
Non-Urgent Compliance	29 of 36	80%	66%	75%	100%
Prenatal Compliance	NR	96%			
Waiting Room Compliance	1 of 36	98%	100%	86%	100%
Callback Compliance	23 of 36	80%	53%	50%	100%
Reschedule Callback Complia	3 of 36	90%	97%	100%	75%
Reschedule Process Complia	1 of 36	99%	100%	100%	100%

Response Rates	5	
Outcome =	Count	Percentage
Response	54	38.3%
No Response	47	33.3%
Refused	16	11.3%
Ineligible	24	17.0%



Providers



PCP After Hours Dashboard (Example)

PCP After-Hours

Measure Level Compliance	e				
Measure	Ranking	Goal	2023	2022	2021
Access ER Compliance	31 of 36	80%	57%	27%	100%
Access Reach Compliance	24 of 36	80%	71%	27%	86%
Timeliness Compliance	28 of 36	80%	62%	20%	86%

Response Rat	es	
Outcome =	Count	Percentage
Response	65	98.5%
Ineligible	1	1.5%



Providers



Discussion and Feedback

- Which access to care standard gaps are you most concerned with?
- What is your understanding of root causes?
- What ideas and resources do you have for deepening provider engagement around Access to Care?
- What additional resources do you have for helping practices to expand access?

Questions?





MY2023 HEDIS Results



Compliance & Quality Committee Date: September 19, 2024 Presenter: Thomas Mendez



Report Content & Background

MY2023 HEDIS Summary

All HEDIS Measurement Year (MY) 2023 Submissions for all Lines of Business (LOB) were successfully completed in June 2024.

L.A. Care maintained a 3.5 NCQA Health Plan Rating (HPR) for Medi-Cal which is the same earned rating since MY2020

The DSNP HPR was not calculated as the plan is new and didn't have eligible members for the CAHPS survey

NCQA does not calculate Marketplace HPR

Key Findings

MY2023 HEDIS

In general, HEDIS rates have been improving Year over Year since COVID-19 (MY2020).and rates have returned or are exceeding pre-COVID levels

	Measures	Measures
	Improved	Declined
DSNP Admin Measures	45	34
DSNP Hybrid Measures	6	8
LACC Admin Measures	22	13
LACC Hybrid Measures	12	1
Medi-Cal Admin Measures	68	30
Medi-Cal Hybrid Measures	14	1
Totals	167	87

Highlights/Goals Met

MY2023 HEDIS

Managed Care Accountability Set (MCAS) Minimum Performance Level (MPL) measures, 11 out of 18 reached the MPL.

Lead Screening in Children (LSC), Topical Fluoride (TFL), and Well Visits for Children and Adolescents were 3 measures that reached MPL that did not meet in MY2022. Penalties from DHCS are expected to be approximately \$500K less than last year due to these improvements.

Quality Transformation Initiative (QTI) measures. 3 out of 4 were above MY2022

Controlling Blood Pressure (CBP) reached the 50th percentile and is 5.19% over last year

Colorectal Cancer Screening (COL) (5.03%) and HbA1c for Diabetics (HBD) (5.84%) are also significantly above last year's final

Any Areas of Poor Performance (?)

MY2023 HEDIS

For the MCAS MPL measures, areas of concern are:

Childhood Immunization Status (CIS) where the rate for the Influenza vaccine continues to decline year over year

Cervical Cancer Screening (CCS) the rate has been trending downward for this measure since COVID-19 as this is a 5 year measure that hasn't been recovering

For the QTI measures, there has been improvement however, all 4 are still well below the required 67th percentile, so there are still very substantial penalties expected

Root Cause Analysis for any Areas of Poor Performance

Access to care continues to be an issue for several measures, especially for measures that require in person visits and/or multiple visits to be compliant for the measure, such as cervical cancer screenings, well child visits, and colorectal cancer screenings.

As examples, we have seen a significant increase in the number of immunizations that are given late, colonoscopies that take several months to schedule

Questions?

