

**REPORT ON MEMBER PCP DISRUPTION FOR 2024  
TRANSITIONING MANAGED CARE PLANS SPECIFIC TO  
SPECIAL TERMS AND CONDITIONS 12.2.c  
SECTION 1115(A) CALIFORNIA ADVANCING AND  
INNOVATING MEDI-CAL WAIVER  
PROJECT NUMBER 11-W-00193/9**

**California Department of Health Care Services (DHCS)**

**June 2024**

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## Introduction

The Centers for Medicare & Medicaid Services (CMS) approved an amendment to the section 1115(a) Demonstration titled, “California Advancing and Innovating Medi-Cal” (CalAIM) (Project Number 11-W-00193/9) on August 23, 2023. Approval of this Demonstration amendment allows California to limit choice of Medi-Cal Managed Care Plans (MCPs) in specified geographic regions and implement county-authorized managed care programs, also known as the county organized health system (COHS) model. These new county-authorized managed care programs are similar to those that already exist in other counties in California, which have proven to be an effective model for providing Medicaid coverage for adults and youth. This amendment aims to reduce administrative complexity for providers and members, while streamlining state oversight and improving accountability of plans.

This amendment includes additional requirements, also known as the 1115 Waiver Special Terms and Conditions (STCs) related to MCP readiness, Continuity of Care (CoC), Network Adequacy and Capacity for the COHS and Single plans, Appeals and Grievances for children with special health care needs served by MCPs expanding Whole Child Model for California Children’s Services (CCS) program, and choice of PCPs for transitioning members in the transitioning counties. This amendment is effective as of August 23, 2023, and will remain in effect throughout the Demonstration approval period, which is set to expire December 31, 2026. DHCS submitted the comprehensive report addressing STCs 12.1 through 12.6 on December 29, 2023.

## Contents of this Report

STC 12.2c requires DHCS to submit a monthly report detailing Primary Care Physician (PCP) disruption to CMS for 6 months following the transition. DHCS submits this Member PCP Retention report as an addendum to the comprehensive STC report submitted to CMS on December 29, 2023, to meet the CMS monthly reporting requirements. This Member PCP Retention report serves as the sixth monthly submission on PCP disruption to CMS.

Reporting Period		Submission to CMS
January	1/1/2024 – 1/31/2024	3/1/2024
February	2/1/2024 – 2/29/2024	3/29/2024

Reporting Period		Submission to CMS
March	3/1/2024 – 3/31-2024	4/30/2024
April	4/1/2024 – 4/30/2024	5/30/2024
May	5/1/2024 – 5/31/2024	6/28/2024
June	6/1/2024 – 6/30/2024	7/30/2024

## 12.2 Continuity of Care

### Assessing Compliance

#### 12.2.c.

##### Member PCP Retention:

DHCS collects a monthly data stream from MCPs, including Alameda Alliance for Health (AAH), Central California Alliance for Health (CCAH), Contra Costa Health Plan (CCHP), Community Health Plan of Imperial Valley (CHPIV), and Partnership Health Plan of California (PHC), detailing the number of members that retained their PCP assignment post-transition. MCPs report to DHCS the number of members that retained their PCP assignment, the number of members that chose a different PCP, and the number of members that did not retain their PCP, including the reason the member did not retain their PCP.

DHCS uses the data collected from MCPs to perform the PCP retention and disruption calculations included in “Exhibit 12.2c – PCP Retention Results” and assess MCPs for compliance with the 90 percent PCP retention requirement for each county impacted by the transition. DHCS calculated “Member PCP retention” figure by dividing the “Count of Members Retaining PCP” by the “Count of Transitioning Members” adjusted to remove the “Count of Members that Chose a New PCP.” Member choice of PCP is paramount and must override any auto-assignment, including auto-assignment based on the provider’s prior relationship with the MCP. As such, DHCS excluded the “Count of Members that Chose a New PCP” from the denominator of the PCP retention calculation.

“Exhibit 12.2.c – PCP Retention Results – June 2024” below details the figures included in the “Member PCP Retention” calculation and includes DHCS’ compliance assessment for each MCP for each county impacted by the transition. Please find previous monthly PCP Retention Results in Appendix A.

### Exhibit 12.2c – PCP Retention Results – June 2024 Reporting Period

MCP Name	County	Count of Transitioning Members	Count of Members that Chose a New PCP	Count of Members Retaining PCP	Count of Members Not Retaining PCP	Member PCP Retention (%) <sup>1</sup>	Compliance Assessment (compliant >=90%, non-compliant <= 90%)
AAH	Alameda	70,671	3,105	63,951	3,615	95%	Compliant
CAAH	Mariposa	3,492	11	3,304	177	95%	Compliant
CAAH	San Benito	9,999	17	9,546	436	96%	Compliant
CCHP	Contra Costa	32,170	447	30,259	1,464	95%	Compliant
CHPIV	Imperial	95,352	1,931	93,373	48	100%	Compliant
PHC	Butte	69,685	9,375	57,625	2,685	96%	Compliant
PHC	Colusa	8,703	446	8,061	196	98%	Compliant
PHC	Glenn	10,529	1,049	9,236	244	97%	Compliant
PHC	Nevada	23,290	1,143	21,306	841	96%	Compliant
PHC	Placer	44,394	3,060	37,526	3,808	91%	Compliant
PHC	Plumas	5,065	243	4,815	7	100%	Compliant
PHC	Sierra	612	44	566	2	100%	Compliant
PHC	Sutter	35,411	2,746	32,281	384	99%	Compliant
PHC	Tehama	24,588	2,193	21,128	1,267	94%	Compliant
PHC	Yuba	27,898	1,973	25,367	558	98%	Compliant

<sup>1</sup> Count of members that chose a new PCP is excluded from the denominator of the PCP Retention calculation.

## **Corrective Action and Enforcement**

DHCS will place MCPs on a Corrective Action Plan (CAP) should an MCP fail to comply with the PCP retention requirements at any point during the six months following the transition. MCPs placed on a CAP must submit a detailed plan of action setting forth all steps the MCP will take to correct the PCP retention deficiency, and they are required to correct the deficiency within three months from the date of the CAP letter. MCPs placed on a CAP for non-compliance with the PCP retention requirement are required to conduct outreach to all out-of-network (OON) PCPs identified as serving a transitioning member prior to the transition for the purposes of securing an agreement. In addition, those MCPs must authorize OON access to PCPs to minimize member disruption while the MCP continues efforts to secure agreements with OON PCPs.

DHCS placed PHC on a CAP, effective February 27, 2024, for failure to retain at least 90 percent of transitioning members' PCPs in Placer County. PHC submitted their CAP response on March 13, 2024, detailing their plan of action to address the deficiency. PHC described improvements to their data validation processes, which are used to operationalize the provider data shared by Previous Plans that improved the quality of the data flowing to the contracting and CoC departments. PHC conducted outreach to OON PCPs and provider groups to contract with providers and enter into Continuity of Care agreements. PHC secured multiple agreements including a contract with Sutter Health that addressed a significant number of PCPs to which members were previously assigned.

As a result of these efforts, PHC achieved compliance in their February reporting period submission and have maintained this compliance during each reporting period since, most recently demonstrated by the June reporting period. DHCS initially planned to close the CAP on PHC after two successful reporting periods demonstrating compliance. However, PHC's network provider agreement with CommonSpirit expired as of April 1, 2024 and DHCS kept the CAP open to monitor potential impacts to PCP retention. When a MCP and their provider network agreement terminates or expires, DHCS requires the MCP to take specific steps to ensure that members who are likely to be affected by the termination maintain continued access to medically necessary covered services. In the case of the PHC and CommonSpirit Health termination, when DHCS was notified of the termination, DHCS immediately began to obtain information from PHC to identify the impact on Medi-Cal members' access to care in accordance with All Plan Letter (APL) 21-

003<sup>2</sup>. Within the April and May reporting period submissions, PHC did not report any significant impacts to PCP retention resulting from the CommonSpirit contract expiration. PCP retention remained above 90 percent in all counties.

On June 10, 2024, PHC reported the Plan executed an agreement with CommonSpirit that is inclusive of all previously contracted sites and represents no material difference in terms of network or access to care compared to the prior agreement. As such, DHCS closed the PHC PCP retention CAP on June 24, 2024. DHCS received data for the June 2024 reporting period on July 3, 2024, and the data confirmed PHC remained compliant following the closure of their PCP retention CAP.

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<sup>2</sup> See All Plan Letter (APL) 21-003 at [APL 23-001 \(ca.gov\)](#)

## Appendix A

### PCP Retention Results – January 2024 Reporting Period

MCP Name	County	Count of Transitioning Members	Count of Members that Chose a New PCP	Count of Members Retaining PCP	Count of Members Not Retaining PCP <sup>3</sup>	Member PCP Retention (%) <sup>4</sup>	Compliance Assessment (compliant >=90%, non-compliant <= 90%)
AAH	Alameda	77,612	467	74,405	2,740	96%	Compliant
CAAH	Mariposa	3,677	0	3,383	294	92%	Compliant
CAAH	San Benito	10,079	0	9,772	307	97%	Compliant
CCHP	Contra Costa	30,144	447	28,233	1,464	95%	Compliant
CHPIV	Imperial	94,895	1,979	92,867	49	100%	Compliant
PHC	Butte	76,737	2,318	72,010	2,409	97%	Compliant
PHC	Colusa	9,654	14	9,277	363	96%	Compliant
PHC	Glenn	11,910	235	11,610	65	99%	Compliant
PHC	Nevada	25,639	50	23,296	2,293	91%	Compliant
PHC	Placer	48,725	182	42,573	5,970	88%	Non-compliant
PHC	Plumas	5,438	7	5,331	100	98%	Compliant
PHC	Sierra	678	0	658	20	97%	Compliant
PHC	Sutter	38,253	94	36,388	1,771	95%	Compliant
PHC	Tehama	17,654	178	15,974	1,502	91%	Compliant
PHC	Yuba	31,388	55	30,087	1,246	96%	Compliant

<sup>3</sup> DHCS made copyediting corrections to the previously reported "Count of Members Not Retaining PCP". These corrections have no impact on the "Member PCP Retention" calculation or the "Compliance Assessment."

<sup>4</sup> Count of members that chose a new PCP is excluded from the denominator of the PCP Retention calculation.



## PCP Retention Results – February 2024 Reporting Period

MCP Name	County	Count of Transitioning Members	Count of Members that Chose a New PCP	Count of Members Retaining PCP	Count of Members Not Retaining PCP <sup>5</sup>	Member PCP Retention (%) <sup>6</sup>	Compliance Assessment (compliant >=90%, non-compliant <= 90%)
AAH	Alameda	75,068	532	70,929	3,607	95%	Compliant
CAAH	Mariposa	4,266	0	4,111	155	96%	Compliant
CAAH	San Benito	12,365	0	11,803	562	95%	Compliant
CCHP	Contra Costa	32,170	447	30,259	1,464	95%	Compliant
CHPIV	Imperial	95,070	2,024	92,997	49	100%	Compliant
PHC	Butte	75,634	2,228	71,114	2,292	97%	Compliant
PHC	Colusa	9,431	97	9,293	41	100%	Compliant
PHC	Glenn	11,678	265	11,175	238	98%	Compliant
PHC	Nevada	25,034	171	24,521	342	99%	Compliant
PHC	Placer	47,546	414	45,640	1,492	97%	Compliant
PHC	Plumas	5,316	45	5,240	31	99%	Compliant
PHC	Sierra	667	5	661	1	100%	Compliant
PHC	Sutter	37,592	674	36,726	192	99%	Compliant
PHC	Tehama	26,906	455	26,124	327	99%	Compliant
PHC	Yuba	30,763	392	30,155	216	99%	Compliant

<sup>5</sup> DHCS made copyediting corrections to the previously reported "Count of Members Not Retaining PCP". These corrections have no impact on the "Member PCP Retention" calculation or the "Compliance Assessment."

<sup>6</sup> Count of members that chose a new PCP is excluded from the denominator of the PCP Retention calculation.

## PCP Retention Results – March 2024 Reporting Period

MCP Name	County	Count of Transitioning Members	Count of Members that Chose a New PCP	Count of Members Retaining PCP	Count of Members Not Retaining PCP <sup>7</sup>	Member PCP Retention (%) <sup>8</sup>	Compliance Assessment (compliant >=90%, non-compliant <= 90%)
AAH	Alameda	73,928	862	69,403	3,663	95%	Compliant
CAAH	Mariposa	4,266	11	4,143	112	97%	Compliant
CAAH	San Benito	12,365	17	11,841	507	96%	Compliant
CCHP	Contra Costa	32,170	447	30,259	1,464	95%	Compliant
CHPIV	Imperial	95,192	2,062	93,081	49	100%	Compliant
PHC	Butte	74,768	5,789	66,383	2,596	96%	Compliant
PHC	Colusa	9,235	215	8,975	45	100%	Compliant
PHC	Glenn	11,487	653	10,710	124	99%	Compliant
PHC	Nevada	24,471	670	23,323	478	98%	Compliant
PHC	Placer	46,532	2,252	40,408	3,872	91%	Compliant
PHC	Plumas	5,251	34	5,115	102	98%	Compliant
PHC	Sierra	650	13	636	1	100%	Compliant
PHC	Sutter	36,925	1,528	35,202	195	99%	Compliant
PHC	Tehama	26,179	1,245	24,411	523	98%	Compliant
PHC	Yuba	30,166	1,189	28,594	383	99%	Compliant

<sup>7</sup> DHCS made copyediting corrections to the previously reported "Count of Members Not Retaining PCP". These corrections have no impact on the "Member PCP Retention" calculation or the "Compliance Assessment."

<sup>8</sup> Count of members that chose a new PCP is excluded from the denominator of the PCP Retention calculation.

## PCP Retention Results – April 2024 Reporting Period

MCP Name	County	Count of Transitioning Members	Count of Members that Chose a New PCP	Count of Members Retaining PCP	Count of Members Not Retaining PCP	Member PCP Retention (%) <sup>9</sup>	Compliance Assessment (compliant >=90%, non-compliant <= 90%)
AAH	Alameda	73,928	862	69,403	3,663	95%	Compliant
CAAH	Mariposa	3,492	11	3,304	177	95%	Compliant
CAAH	San Benito	9,999	17	9,546	436	96%	Compliant
CCHP	Contra Costa	32,170	447	30,259	1,464	95%	Compliant
CHPIV	Imperial	95,235	2,061	93,126	48	100%	Compliant
PHC	Butte	73,117	7,256	62,857	3,004	95%	Compliant
PHC	Colusa	8,866	359	8,484	23	100%	Compliant
PHC	Glenn	11,176	809	10,173	194	98%	Compliant
PHC	Nevada	23,738	877	22,286	575	97%	Compliant
PHC	Placer	45,589	2,691	38,935	3,963	91%	Compliant
PHC	Plumas	5,168	189	4,960	19	100%	Compliant
PHC	Sierra	646	33	610	3	100%	Compliant
PHC	Sutter	36,011	2,323	33,282	406	99%	Compliant
PHC	Tehama	25,513	2,355	20,940	2,218	90%	Compliant
PHC	Yuba	29,447	1,487	27,251	709	97%	Compliant

<sup>9</sup> Count of members that chose a new PCP is excluded from the denominator of the PCP Retention calculation.

## PCP Retention Results – May 2024 Reporting Period

MCP Name	County	Count of Transitioning Members	Count of Members that Chose a New PCP	Count of Members Retaining PCP	Count of Members Not Retaining PCP	Member PCP Retention (%) <sup>10</sup>	Compliance Assessment (compliant >=90%, non-compliant <= 90%)
AAH	Alameda	70,671	3,105	63,951	3,615	95%	Compliant
CAAH	Mariposa	3,492	11	3,304	177	95%	Compliant
CAAH	San Benito	9,999	17	9,546	436	96%	Compliant
CCHP	Contra Costa	32,170	447	30,259	1,464	95%	Compliant
CHPIV	Imperial	95,301	1,907	93,346	48	100%	Compliant
PHC	Butte	71,469	8,471	57,653	5,345	92%	Compliant
PHC	Colusa	8,703	446	8,061	196	98%	Compliant
PHC	Glenn	10,944	950	9,397	597	94%	Compliant
PHC	Nevada	23,290	1,143	21,306	841	96%	Compliant
PHC	Placer	44,394	3,060	37,526	3,808	91%	Compliant
PHC	Plumas	5,065	243	4,815	7	100%	Compliant
PHC	Sierra	631	40	589	2	100%	Compliant
PHC	Sutter	35,411	2,746	32,281	384	99%	Compliant
PHC	Tehama	24,588	2,193	21,133	1,262	94%	Compliant
PHC	Yuba	28,718	1,734	26,321	663	98%	Compliant

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<sup>10</sup> Count of members that chose a new PCP is excluded from the denominator of the PCP Retention calculation.