

February 24, 2012

Toby Douglas Director California Department of Health Care Services 1501 Capitol Ave., 6th Floor, MS 0002 Sacramento, CA 95814

Dear Mr. Douglas:

Health Net Community Solutions, Inc. (Health Net) is pleased to submit its Application in response to California's Dual Eligible Demonstration (Demonstration) Request for Solutions. We have more than 20 years of experience serving Medi-Cal and Medicare beneficiaries in Los Angeles County. Our experience uniquely qualifies us to enhance the County's Dual Eligible beneficiaries' ability to self-direct their care, improve their satisfaction with care provided as well as the coordination of their care. This Demonstration will strengthen our existing partnership with the Department of Health Care Services (DHCS) and Centers for Medicare and Medicaid Services (CMS) as we collectively strive to achieve the goals of the pilot.

The selection of Los Angeles County for inclusion in the Demonstration will offer the State and CMS the opportunity to implement the full spectrum of managed care support across physical and behavioral health, as well as home and community based services using the proven Medi-Cal Two-Plan Model. The demographics of Los Angeles County provide the Demonstration with a highly diverse population comprised of approximately 376,000 eligible beneficiaries. Additionally, the provider community is extensive and capable of delivering optimally integrated and coordinated medical, behavioral, home and community based care. The selection of Los Angeles County is even more significant given the collaborative work that has occurred between the Two-Plan Model health plans, Health Net and LA Care. For the past eleven months, our two companies have worked collaboratively to design approaches that will achieve effective program cost management while preserving beneficiary access and choice to the entire continuum of care in Los Angeles County.

Our Application is submitted knowing that many of the considerations that provide the financial underpinnings for the Demonstration are yet to be finalized. Rates need to be established to responsibly provide compensation for the array of support and care that is to be provided under the Demonstration. Final decisions regarding certain policies and the transition of specific care components (e.g., Long Term Care) to the health plans, and inclusion of beneficiaries currently under D-SNPs without a Medi-Cal contract need to be made to ensure coordination of care occurs throughout Los Angeles County. We look forward to the opportunity to collaborate with DHCS and CMS in finalizing these critical financial arrangements and program decisions.



Our corporate mission is to help members be healthy, secure and comfortable. We are confident that the goals of this Demonstration can be achieved and the quality of life for Dual Eligible beneficiaries in Los Angeles County be improved.

Sincerely,

David J. Friedman Vice President

Health Net Community Solutions, Inc.

Martha J. Smith

Chief Program Officer

Dual Eligible Demonstration

Martha Soux









Project Narrative and Supporting Attachments

California's Dual Eligible Demonstration Request for Solutions

Los Angeles County Application

February 24, 2012



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Executive Summary Section

With over two decades of managed care experience ensuring coverage to both the underserved and senior populations, Health Net Community Solutions, Inc. (Health Net) is pleased to present its application to the Department of Health Care Services' (DHCS) Request for Solutions (RFS) for the Dual Eligible Demonstration Project (Demonstration) in Los Angeles (LA) County - home to approximately 376,000 Dual Eligible beneficiaries. Our commitment to these underserved populations predates the Two-Plan model when Health Net operated as a Prepaid Health Plan (PHP) from 1984 to 1998.

Health Net's response illustrates our understanding of the Demonstration goals established by Senate Bill 208 and DHCS and is based on the Centers for Medicare and Medicaid Services (CMS) guidance and stakeholder input as outlined in the RFS.

Health Net's response sets forth our goal of focusing the benefits of the Demonstration on maximizing beneficiaries' abilities to self-direct their care by placing them at the center of the integrated health home, with sound protections; minimizing provider disruption by building on the Two-Plan model; rationalizing and simplifying the points of contact and care coordination for beneficiaries,









providers, and home- and community-based support services programs; and bringing substantial scale to demonstrate success.

Health Net's application is the result of a collaborative effort with LA Care, the Local Initiative in LA County, to provide beneficiaries access to the best coordinated and integrated health care services available in the county. Both Health Net and LA Care have received National Committee for Quality Assurance (NCQA) accreditation and have a history of working collaboratively on a variety of endeavors ranging from facility site reviews to community outreach, since the Two-Plan Model's inception in 1998. Most recently, our two companies collaborated on provider training for the transition of the Seniors and Persons with Disabilities (SPD) members into Medi-Cal Managed Care.

We believe that this collaboration is in the best interests of the DHCS as it builds upon a tested model in management of high-risk populations, fosters a broad choice for consumers without excessive overhead, enables a systematic approach to deliver reform, protects and expands key community resources, and provides proven savings to both the DHCS and CMS.

Health Net and LA Care will collaborate on consistent activities that can positively impact the beneficiary experience. For example, we intend to collaborate in the consistent application of benefits, such as long-term care (LTC)









and Community-Based Adult Services (CBAS) centers, as well as with home- and community-based services (HCBS) and potentially on select administrative functions. However, we will maintain separate provider networks and retain our individual medical management procedures.

Health Net and LA Care have the existing capacity to scale infrastructure and share services to support the Dual Eligible beneficiaries in LA County and are working with several of Health Net's key provider partners – Molina Healthcare, HealthCare Partners, AltaMed Health Services Medical Corporation (AltaMed), Heritage Provider Network, and Facey Medical Group, among others – to prepare for this endeavor.

We are committed to delivering the right care at the right time in the right place. We believe that the combination of Health Net and LA Care is the solution for LA County for this Demonstration.

Section 1. Program Design

Section 1.1 Program Vision and Goals

Health Net offers a programmatic and operational solution for an integrated care model for LA County Dual Eligible beneficiaries. We bring significant experience creating solutions and implementing large-scale programs and have been working collaboratively with LA Care to develop an effective and efficient









county-wide solution. An LA County Demonstration offers the DHCS and CMS the following advantages:

- Familiar existing choices for beneficiaries, who know and trust the combined efforts of Health Net, LA Care, and our large networks of partnering plans and providers
- Sufficient scale to secure results for the Dual Eligible population as a whole, as well as for sub-populations
- Experienced, culturally-competent, NCQA-accredited health care plans—Health Net and LA Care—that have demonstrated the ability to both compete and collaborate in the best interest of beneficiaries
- Existing operational infrastructure using the Two-Plan Model to ensure efficient and timely implementation
- Availability of existing special initiatives, such as the Program of All-inclusive Care for the Elderly (PACE), to ensure health continuity of care delivery
- Ability to secure near and long-term quality of care improvements
- Identified means to generate cost savings for the State and Federal governments

Health Net and LA Care recognize the need to include strong consumer protections when tailoring the benefits to meet the needs of beneficiaries and









their advocates. We are collaboratively engaged with the beneficiary and advocacy communities, and plan to ensure extensive engagement with these representatives to secure valuable input into important design. implementation, and ongoing operation of the Demonstration.

We also recognize that high quality care at a lower cost can be delivered to beneficiaries within the managed care environment. Therefore, our solution offers all of the managed care elements and embraces passive enrollment, with the opportunity for beneficiaries to opt out. We expect to offer enhanced benefits and services so that beneficiaries can meet their health care goals while remaining within the organized care delivery systems of Health Net or LA Care.

Question 1.1.1 Describe the experience serving dually eligible beneficiaries, both under Medi-Cal and through Medicare Advantage Special Needs Plan contracts, if any.

Health Net and its predecessor companies (Foundation Health and Amerimed) have maintained continuous Medi-Cal operations for 28 years. Starting operations as a PHP in 1984 in three Southern California counties, Health Net has expanded our service area to include nine other counties and enhanced our capabilities to provide services to meet the evolving needs of the DHCS and our members. Over the years, many Dual Eligible and SPD beneficiaries have chosen Health Net as their managed care program. Since June 2011, Health Net has successfully









transitioned approximately 65,000 SPD members into mandatory Medi-Cal Managed Care. Health Net currently arranges health care services for over 882,000 Medi-Cal beneficiaries in 12 California counties, with over 475,000 in LA County.

Health Net has offered Medicare HMO products since 1992 and has provided comprehensive benefits with a long-standing commitment to the health home model. Health Net has entered its seventh year offering Dual Eligible Special Needs Plans (D-SNP) in LA County. Due to our experience providing high-quality, NCQA-accredited care and services to eligible populations, Health Net has been selected to offer Chronic-SNPs and D-SNPs. Figure 1 illustrates Health Net's existing Medicare Advantage and D-SNP membership.

Figure 1. Health Net's Medicare Advantage and D-SNP Membership

| | California | Los Angeles County |
|-------------------------------|------------|--------------------|
| Medicare Advantage Members | 140,000 | 20,000 |
| D-SNP Members | 15,000 | 4,000 |

Health Net's current Medicare coverage includes valuable benefits, such as prescription drugs, dental care, and eyeglasses, as well as transportation and wellness programs designed especially for the unique needs of older adults. Additionally, Health Net has a long history of rewarding practitioners for









delivering high-quality, person-centered care through the capitated Participating Physician Group (PPG) health home model (See **Section 7.2**).

Question 1.1.2 Explain why this program is a strategic match for the Applicant's overall mission.

At Health Net, our mission is to help our members be healthy, secure, and comfortable. We embrace strategies that allow us to deliver high-quality health plan services and focus on our relationships with our members, providers, and government customers. Health Net's extensive Medicare and Medi-Cal experience, combined with our knowledge, infrastructure, and abilities, make us uniquely qualified to fulfill our mission in addressing the challenges posed by the diverse ethnic, cultural, health, and social support needs of Dual Eligible beneficiaries.

Health Net has been the Commercial Plan since the inception of the Two-Plan Model in LA County 14 years ago. This model offers an established platform upon which to build an integrated managed care program for Dual Eligible beneficiaries. Health Net is positioned to provide a comprehensive and fully integrated LA County-specific solution that leverages our experience with existing programs, structures, and systems of care.

While Health Net and LA Care are submitting separate RFS responses (as required by the RFS), we are collaborating in a manner that will enhance the









beneficiary experience, both at the outset of the Demonstration and as the spectrum of services expands to include the full integration of long-term supportive services (LTSS), inclusive of In-Home Supportive Services (IHSS), LTC, and community-based services. These efforts aim to simplify navigation for both beneficiaries and providers while enhancing coordination of services throughout the entire continuum of care. At the heart of Health Net's mission is developing robust solutions that improve the quality and cost-effective delivery of care to beneficiaries.

Explain how the program meets the goals of the Duals Question 1.1.3 Demonstration.

Health Net supports the Demonstration goals: generating greater value for California by rebalancing the health care delivery system to provide coordinated and person-centered care and improving beneficiary health outcomes achieved for each dollar invested. Figure 2 illustrates how Health Net will deliver a program to meet the State's goals and objectives.









Figure 2. Health Net Meeting Demonstration Goals

| SB 208 Demonstration Goal | Evidence of How Health Net Program Meets Goal |
|---|---|
| 1. Coordinating benefits and access to care, improving continuity of care and services. | Streamlined continuum of care, care coordination, evidence-based interventions, and use of intensive case management, as demonstrated in our SNP Model of Care (MOC) for the Dual Eligible Demonstration in LA County (Attachment 4) With the primary care provider (PCP) as a key provider of care in the health home model, Health Net will increase access to primary care services and ensure high standards of quality of care across the care continuum through its quality standards Experience managing care for Dual Eligible beneficiaries with both D-SNP and Medi-Cal Managed Care programs, and SPD Medi-Cal-only beneficiaries, who have a similar incidence of co-morbidity within similar clinical conditions Experience transitioning D-SNP and SPD populations to managed care Transition care experience with D-SNP and SPD populations and member assistance post acute care to return home |









SB 208 Demonstration Goal

Evidence of How Health Net Program Meets Goal

2. Maximizing the ability of Dual Eligible beneficiaries to remain in their homes and communities with appropriate services and supports in lieu of institutional care.

Health Net will:

- Seek to enable beneficiaries to remain in their homes for as long as possible and assist them to return to their homes after an acute episode of care. Health Net will collaborate with LA Care to:
 - Expand contractual relationships with the County to include IHSS integration
 - Develop processes to allow for the sharing of care needs information
- Explore contracts with existing Multi-Purposes Senior Services
 Programs (MSSP) contractors in LA for the provision of MSSP services
- Employ Interdisciplinary Care Team (IDCT) staff to refer
 Demonstration enrollees to existing HCBS services
- Collaborate with LA Care during the 2012 planning phase and Year 1 of the Demonstration (2013) to develop uniform HCBS care collaboration agreements that:
 - Develop a mechanism for in-home LTSS assessments,
 working with existing County Department of Public Social
 Services (DPSS) social workers who currently perform IHSS
 assessments to include expanded health-related needs
 - Refine the implementation of a uniform LTSS assessment tool
 - Work with Personal Assistance Services Council (PASC) and member stakeholders to develop a phased plan to improve the overall member/caregiver experience in the IHSS program
- Develop a central intake entity to coordinate all HCBS for Demonstration participants
- Build on transitions of care experience with D-SNP and SPD populations to develop best practice models for returning home









| SB 208 Demonstration Goal | Evidence of How Health Net Program Meets Goal |
|--|---|
| 3. Increasing availability and access to home- and community-based alternatives. | Develop an HCBS funding plan to increase the availability of services to the Demonstration population by redirecting savings from delayed and avoided institutional stays |
| DHCS Demonstration Goal | Evidence of How Health Net Program Meets Goal |
| 1. Preserve and enhance the ability for consumers to self-direct their care and receive high quality care. 2. Improve health processes and | The existing Medi-Cal Two-Plan Model has the advantage of providing both a familiar choice for beneficiaries who know and trust Health Net and our large network of providers (See Section 7) Collaborating with existing HCBS and LTSS programs to ensure the preservation of beneficiary self-directed care standards The managed care model, as demonstrated in other mandated Medi-Cal populations, has proven it can achieve actual savings through efficiencies and better coordinated care |
| satisfaction with care. | Cultural competence, as demonstrated with NCQA Distinction Status for Multicultural Health Care |
| 3. Improve coordination of and timely access to care. | The managed care model has demonstrated it can achieve actual savings through efficiencies and better coordinated care. Streamlined access to the continuum of care, care coordination, evidence-based interventions, and use of intensive case management, as demonstrated in our MOC (Attachment 4) 24/7/365 access to Member Services Center that can assist members with removing barriers to accessing care in real time |









| DHCS Demonstration Goal | Evidence of How Health Net Program Meets Goal |
|---|--|
| 4. Optimize the use of Medicare, Medi-Cal and | Experience serving vulnerable and at-risk populations through an organized, comprehensive, and accountable care delivery system Lessons learned in the transition of SPD members into Medi- |
| other State/County resources. | Cal Managed CareVariety of reimbursement modelsUse of intensive case management/other coordinated services |

Section 1.2 Comprehensive Program Description

Describe the overall design of the proposed program, Question 1.2.1 including the number of enrollees, proposed partners, geographic coverage area and how you will provide the integrated benefit package described above along with any supplemental benefits you intend to offer. (You may mention items briefly here and reference later sections where you provide more detailed descriptions.)

Health Net and LA Care are proposing a collaborative, comprehensive, Managed Care model that includes all 376,000 Dual Eligible beneficiaries in LA County. Health Net is prepared to enroll in excess of 188,000 new Dual Eligible beneficiaries in the Demonstration; assuming an equal split between the choice of plans. Health Net is committed to developing its provider network to accommodate additional enrollment as needed (See Section 7.1).

Organized Care Delivery System: Dual Eligible beneficiaries would have a choice of two organized, accountable, and comprehensive care delivery system: Health Net and LA Care, including their respective subcontracting health plans and their









provider groups. Health Net has received letters of commitment from our subcontracting health plan, Molina Healthcare, and several health care providers interested in participating in the Demonstration, including, but not limited to, Health Care Partners, Heritage Provider Network, AltaMed, Hispanic Physicians IPA, Brand New Day, and Facey Medical Group. Together, we offer a Demonstration program that assures all partners' interests are aligned with delivering organized, person-centered, and cost-efficient care to Dual Eligible beneficiaries, resulting in measurably improved outcomes. We will do this in a fashion that is inclusive of the key stakeholders in LA County that share a common interest in delivering high-quality care at a reasonable cost, while adhering to the rules, regulations, and oversight imperative to ensure Demonstration success.

A combined Medicare/Medi-Cal benefit package, enhanced with additional value-added benefits and services, will be offered as a means of helping beneficiaries meet their health care goals. Health Net and LA Care propose that the covered benefits across participating plans be standardized in order to reduce selection bias and integrate HCBS, behavioral health, and IHSS. Health Net supports DHCS' and CMS' goals of ensuring beneficiary retention in the Demonstration and will explore the possibility of including additional value-added benefits and services that align with that objective to the extent they are









supported by actuarially-sound fiscal rates. Other possible benefits we will consider include:

- Dental coverage
- Vision coverage
- Emergency Response Service
- Enhanced substance use services
- Non-emergency medical appointment transportation
- Gym membership
- Nutrition counseling

In order to assure consumer choice and competition consistent with the current Two-Plan Model, Health Net and LA Care intend to continue to compete for Dual Eligible membership in the same manner. This healthy competition has preserved consumer choice, improved quality, and helped contain costs for the Medi-Cal program, and we believe that the same positive impact will occur in the Demonstration.

Health Net/LA Care Collaboration

To enhance the care delivery model and improve beneficiaries' health care outcomes, Health Net and LA Care intend to work together with providers to develop an on-site care management model in high-volume hospitals, clinics, and physician practices contracted with both health plans to share care management resources. These on-site care managers will facilitate care transitions and work with mental health providers to reduce the high level of recurrent admissions for







Dual Eligible beneficiaries related to severe and persistent mental illness (SPMI). The care managers will have greater opportunity to establish a rapport and expertise with providers and their patients since they will be involved with larger numbers of the providers' patients and will reduce the burden providers could otherwise experience in trying to effectively manage a complex case load. It also helps ensure continuity of care and integration of physical and behavioral health to address the needs of the whole person. This innovative approach is different from similar models in which care managers work for just one plan—they will be a resource for the benefit of all Dual Eligible beneficiaries in the practice or hospital. This joint effort will enable us to increase our ability to provide high-quality medical services to our respective beneficiaries.

Services

The LA Demonstration will test the efficacy of delivering a comprehensive and seamless set of all Medicare services (Parts A, B, and D) and all Medi-Cal services, including LTSS. Medi-Cal-funded behavioral health services will be added to the single blended rate in the second year of the Demonstration, and coordination and contracting with providers of those services is underway.

LTSS: LTSS will be an integral part of the Demonstration. California has made progress toward LTSS system integration into managed care with the inclusion of









CBAS in the array of health plan-offered benefits; however, opportunities remain for diverting Dual Eligible beneficiaries from institutional settings and expanding HCBS over time (See Section 2.1).

HCBS: HCBS programs are an essential part of the lives of many Dual Eligible beneficiaries and an important alternative to institutional care. Health Net and LA Care propose building upon the existing infrastructure of the HCBS program and working with the LA County Department of Public Social Services (DPSS) to explore an expanded role for their 700 plus social workers potentially including an HCBS waiver program evaluation, which will be incorporated in the care coordination plan developed by the health plans.

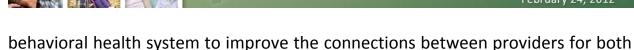
IHSS: Health Net and LA Care will work with the Personal Assistance Services Council (PASC) of Los Angeles County and DPSS to develop an integrated program that preserves this pivotal program for beneficiaries in California. The program has been a key element in California's efforts to balance its delivery system and will be an integral partner in any successful Demonstration (See Section 2.2).

Behavioral Health: We expect that the Medicare and Medi-Cal mental health benefits would be immediately integrated in the first year of the Demonstration. Health Net and LA Care will coordinate closely with the County Medi-Cal









<u>Person-Centered Care:</u> Health Net proposes to create one point of accountability for the delivery, coordination, and management of benefits and services to members that meets regulatory requirements and assures accountability for this program.

physical and mental health while planning for full integration. (See **Section 3.1**)

Our interdisciplinary care teams (IDCTs) employ a person-centered care model, working with the member, caregivers, primary care providers (PCPs), specialists, LTSS providers, community organizations, and others to plan and coordinate a holistic package of services and support. Care managers will be actively engaged with members and PCPs, calling on the expertise of IDCT members to plan and deliver care plans.

We envision multiple care management delivery models. We will encourage large practices and hospitals to embed shared care managers in high-volume facilities to ensure frequent face-to-face contact with providers and members. When co-location is not feasible, we will assign care managers from our own IDCTs with the expertise to help Dual Eligible beneficiaries meet their care goals. (See Section 4.1)









Quality of Care Delivery: Health Net's existing NCQA-accredited Quality Improvement (QI) programs for both our Medicare and Medi-Cal programs are dedicated to rigorous monitoring and quality improvements. We are fully committed to a QI process that includes implementation of special initiatives across Health Net and our subcontracting plans and provider systems (see **Section** 7 and Attachment 14).

Health Information Technology (HIT): It is commonly understood that widespread use of HIT will improve quality, reduce health care costs, and improve efficiencies. As this Demonstration will introduce Dual Eligible beneficiaries into coordinated care settings, Health Net understands that the systems used must be nimble enough to facilitate cost-effective strategies, provide appropriate reporting to DHCS and CMS on the Demonstration effectiveness, and ensure compliance and data integrity. We strive to ensure system stability and also foster CMS systems "meaningful use" expectations (See Section 8).

Consumer Protections and Outreach: We will build upon our recent experience enrolling SPD members to ensure a strong system of consumer protections and outreach. Health Net acknowledges and understands the need for engaging, embracing, and interacting with the advocacy constituents in LA County during









planning, transition, and on an ongoing basis, and propose provisions in the Demonstration to satisfy those requirements. (See Section 5)

Network Composition and Participation Standards: In a county as large and diverse as LA, one size will not fit all. With our extensive experience in delegated health plan and provider group oversight, we plan to validate different care delivery models in the Demonstration. Health Net proposes that minimum participation standards for subcontracting health plans or provider groups be developed in cooperation with CMS and DHCS, ensuring appropriate service levels for health care services and the delivery of quality care. Health Net is taking an inclusive approach, insofar as providers, physicians, and hospitals that meet the criteria, standards, and requirements consistent with program expectations, will be included in our network. (See Section 7)

Describe how you will manage the program within an Question 1.2.2 integrated financing model, (i.e. services are not treated as "Medicare" or "Medicaid" paid services)

Health Net has a dedicated senior management team that will oversee this Demonstration and validate the new capitated payment model using a three-way contract among DHCS, CMS, and Health Net. Health Net plans to deliver a seamlessly integrated program to Dual Eligible beneficiaries that includes a







combined benefit package for which Health Net would receive a blended capitated rate for the full continuum of care.

Health Net will employ different contracting methodologies such as capitation and fee-for-service (FFS) reimbursement, along with shared risk and quality incentives, to reimburse PPGs, hospitals, and ancillary providers that contract with Health Net for the Demonstration. The methodology Health Net will employ is further elaborated in **Section 7.2**.

Once enrolled in Health Net, beneficiaries will receive one ID card and a comprehensive and integrated Explanation of Coverage (EOC) booklet, and may select a PCP. Those who do not select a PCP will have one selected for them based on prior claims history (if supplied), or location, specialty, or gender. One ID card will allow the member and the provider to avoid having to coordinate benefits between Medicare and Medi-Cal and should enhance the patient experience.

Health Net supports the need to evaluate the Demonstration's success and its ability to improve quality while reducing costs, as required by DHCS and CMS. Health Net's computer systems function on an integrated system-wide basis and have the capabilities to administer multiple provider payment methodologies and can effectively process financial, membership, provider, encounter, claims, utilization, and quality data, delivering advanced reporting options.







Question 1.2.3 Describe how the program is evidence-based.

In addition to being NCQA-accredited, Health Net has existing quality management systems for our current Medicare and Medi-Cal products. An example is clinical practice guidelines (CPGs) that have been developed and adopted in order to reduce practice variation and improve the health status of our members. Health Net adopts nationally recognized evidence-based CPGs for medical and behavioral health conditions through our National Medical Advisory Council (MAC) of Health Net medical directors and network practitioners. This group works with the Health Net Quality Improvement Committee (QIC) to review and update CPGs every two years (or more frequently when new scientific evidence or new national standards are published) and obtains input on guidelines from recognized specialists in their field of medicine. Guidelines are evaluated for consistency with Health Net benefits, utilization management criteria, and member education materials. In addition, MAC evaluates new technologies (medical and behavioral health) and devices for safety and effectiveness.

Approved national medical policies and CPGs are published and available to network providers through the provider portal of Health Net's website and through provider communications. PPGs are required to participate in the









collection of Healthcare Effectiveness Data and Information Set (HEDIS®) data to monitor and ensure clinical care is consistent with evidence-based clinical guidelines.

For the Demonstration, Health Net will build from current quality management systems and guidelines to evaluate and implement the appropriate initiatives and incentives across our subcontracted plan(s) and provider systems. The Demonstration is expected to follow the standards and expectations as currently managed and outlined above, ensuring that care is delivered following evidence-based practices and addressing our members' needs in a holistic manner.

Question 1.2.4 Explain how the program will impact the underserved, address health disparities, reduce the effect of multiple co-morbidities, and/or modify risk factors.

Health Net understands that the Dual Eligible population has a greater incidence of chronic disease and utilization of Medicare and Medi-Cal resources and that Dual Eligible beneficiaries present with co-morbid mental health conditions at a higher incidence than that of the Medicare-only population.

Health Net uses a person-centered care model and IDCTs to improve health care outcomes by enhancing care delivery and emphasizing the coordination of services. We recognize the need to address health disparities for vulnerable populations as may be defined by race/ethnicity, socio-economic status,









geography, gender, age, disability status, and risk status. In the Demonstration, all members will have a health risk assessment (HRA) to identify at-risk individuals, as outlined in Element 7 of the D-SNP Model of Care (MOC) (Attachment 4). Care plans that seek to reduce risk factors will be developed with the direct participation of the member and caregiver and will reflect each member's unique needs, preferences, values, and priorities. Further elaboration is provided in Element 8 of the D-SNP MOC (Attachment 4).

In the Demonstration, IDCTs will be key agents in care integration, working with the member, caregivers, PCPs, specialists, LTSS providers, and HCBS programs to plan and coordinate person-centric health care services and supports.

Health Net and its predecessor companies have been meeting the health care needs of an increasingly culturally diverse population in California for the past 28 years. Recently, Health Net was recognized with the NCQA Distinction Status for Multicultural Health Care. One of its five core standards, "Reducing Health Care Disparities", requires organizations to use data to assess the presence of disparities, undertake QI efforts to decrease or eliminate them, and improve culturally and linguistically appropriate care. To meet this standard, Health Net has demonstrated that we undertake QI projects to address disparities or other opportunities to improve culturally and linguistically appropriate services. Health









Net intends to build off this solid foundation, incorporating the same standards to serve the Dual Eligible beneficiaries.

Additionally, Health Net's health education programs combine advanced analytics to find at-risk members and bring to them sophisticated engagement methods and techniques to enable positive behavioral change. We use a comprehensive tool, including wellness risk scoring, to understand the magnitude of the wellness opportunity; assess with the member his or her needs, goals, and expectations; and design a solution that can result in improved health. We will offer Dual Eligible beneficiaries a comprehensive suite of programs and other health education services that can impact health risk factors, especially those prevalent in underserved populations. For example:

• Disease Management Programs: Health Net's Disease Management Programs provide severity-specific interventions to members with diabetes, asthma, congestive heart failure, coronary heart disease, and chronic obstructive pulmonary disease. The programs adhere to a whole-person approach with a focus on removing barriers to care and providing guidance for members' comorbidities. The interventions are tailored to the diverse clinical, cultural, and linguistic needs of our members. Members receive 24/7/365 access to educational resources, reminder calls, and health coaches.









- Heart Health/Cardio Metabolic Risk Management: Our cardio metabolic risk management program supports individuals who have more than one of the following risk factors: a diagnosis of metabolic syndrome, high BMI, high blood sugar/insulin resistance, high blood pressure, high triglycerides, tobacco utilization, and abnormal cholesterol levels. Health coaches are trained to support and educate individuals about critical aspects of care associated with cardio metabolic risk management, and risks that could lead to diabetes and/or cardiovascular disease. Participants who are identified as being obese or using tobacco can also be transferred into the weight management and/or tobacco cessation structured behavior programs.
- **Tobacco Cessation:** Our tobacco cessation program incorporates the latest evidence about effective tobacco cessation. Members receive four outbound coaching calls, unlimited inbound calls to a guit coach, a guit aid workbook, and nicotine replacement therapy.

Question 1.2.5 Explain whether/how the program include component that qualifies under the federal Health Home Plans SPA.

Health Net has key provider partners, such as AltaMed and Brand New Day, in LA County that are true health homes. We are proud to partner with these groups that have fully integrated primary care, specialty care, mental health care, CBAS, Multi-Purposes Senior Services Program (MSSP), and home support services.









These medical groups and clinics use field-based, physician-directed health coaches and nurse case managers to ensure members who are often unable to manage their health care regimen have an opportunity to remain in their community with safety and dignity. This includes members who are frail, elderly, developmentally disabled, seriously and persistently mentally ill, or socially isolated. These provider partners have demonstrated significant and lasting reductions in health care cost by avoiding emergency department (ED) visits; avoiding hospital stays, including acute psychiatric inpatient stays, and limiting hospital stays; and avoiding long term nursing home placement. A robust electronic medical record (EMR) supports these interactions with PCP endorsement and sign off.

Additionally, Health Net has worked with DHCS to develop a survey of our network in conjunction with the other managed care plans, and plans to proceed with administering this survey of our primary care network and provider groups to determine which provider offices are functioning as health homes and which offices are capable of and interested in becoming full health homes.

Health Net provides IDCTs to enhance the health home: case management is available to all members. Additional support includes 24/7/365 access to Nurse Advice Line and Member Services Center. Health Net's 24/7/365 Member Services









interpreter services, appeals, grievances, Center assists with access to hospitalizations, in-network transfers, coordination with PCPs, benefit explanations, assistance with medical appointments, non-emergent medical transportation, and assistance with public programs access.

Identify the primary challenges to successful implementation Question 1.2.6 of the program and explain how these anticipated risks will be mitigated.

Figure 3 outlines the primary challenges to implement a successful Demonstration.

Figure 3. Demonstration Implementation Challenges and Recommended Mitigation

| Challenge | Recommended Mitigation |
|-----------------------|--|
| Offer a more seamless | Coordination across the two plans and their |
| experience for | subcontracting partners in LA County, in collaboration |
| beneficiaries | with LA Care, for select shared services |
| | After a series of planning sessions, a governance |
| | model will be developed to facilitate our shared |
| | services vision. |









Challenge

Recommended Mitigation

Significant additional data needed by the health plans to help ensure an adequate program design and a comprehensive, yet sustainable, benefit package. This data is needed to develop reasonable capitation payment structures and ensure continuity of care with established providers. This data includes, but is not limited to:

Propose working closely with representatives from CMS and DHCS to assist the plans with the timely removal of obstacles and barriers to success. With the direct involvement of DHCS, CMS, plans, and the county in the implementation process, the risk of not receiving needed information to adequately design a sustainable program and benefit package will be mitigated.

Current funding sources and amounts for each of the programs being brought under the umbrella of care Historical claims and/or utilization data, including beneficiary location and prior medical providers, consistent with the benefits expected to be covered under the integrated plan Proposed rates and risk adjustment

SPD members to ensure a strong system of consumer protections and outreach including:

An advisory group comprised of beneficiaries and key

When program change is

proposed, there is a risk

figures may fall short of

that the enrollment









| Challenge | Recommended Mitigation |
|--|--|
| expectations if | constituent representatives during the Demonstration |
| stakeholder concerns | planning and implementation |
| are not addressed | A process to ensure effective and timely transition of services |
| | Clear and understandable education/communication regarding the enrollment and disenrollment process and the ability to opt out |
| | Integrated member material to include: single ID card, enrollment and disenrollment information, Evidence of Coverage (EOC), Summary of Benefits, etc. |
| | Accessible and understandable member materials for members with limited English proficiency or visual or cognitive impairments |
| | Comprehensive Member Services with a single point of contact for Medicare and Medicaid |
| | Web-based services for beneficiaries and their caregivers |
| | Robust plan choice counseling, including translation of member materials and access to alternate modes of information for beneficiaries with diverse communication needs |
| | Appointment assistance for members who face challenges finding an appropriate provider within a reasonable distance in a timely fashion |
| As the delivery of mental health has historically not included the effective and timely integration with medical health services for persons with SPMI, the development of a comprehensive and collaborative approach that includes health | Please refer to Section 3.1 for Health Net's proposed solution to mitigate this risk. |









| Challenge | Recommended Mitigation |
|---|--|
| plans, consumers, providers, the County and other stakeholders is required. | |
| HCBS waiver programs that currently serve Dual Eligible beneficiaries are undergoing significant financial strain. The current demand for these services exceeds the capacity of most agencies to provide them. Therefore, a challenge and risk to integrating these services in the Demonstration is the viability of the infrastructure in some LA communities. | Health Net asks that DHCS consider this concern in the rate development, and reinvest some projected cost savings into strengthening and building HCBS. |
| The success of the Demonstration and the ability of the State to meet the expectations outlined in the Governor's budget proposal are dependent on Dual Eligible beneficiaries remaining in the Demonstration and that the project incurs a low opt out rate. | To achieve high retention rates in the Demonstration, it is imperative that DHCS pay adequate rates that enable plans to offer an enhanced suite of value-added benefits that help beneficiaries meet their health goals. It is also imperative that the State establish a level playing field between the Demonstration plans and any existing D-SNPs in LA County. |









Section 2. Coordination and Integration of LTSS

Health Net and LA Care are committed to ensuring that LTSS remain an integral part of the suite of services available to support the independence of our members. We are prepared to take on the challenge of coordinating and integrating LTSS because of our experience effectively coordinating services for SPD members, coupled with our experience managing the Medicare D-SNP MOC that integrates physical and mental health. The Demonstration furthers our goal of integrating services in a way that maximizes beneficiaries' ability to remain as independent as possible and an integral part of the communities in which they live. Our goals are simple: to improve access, to integrate case management functions, and to develop care coordination plans in conjunction with both the members and their health home provider, all while minimizing confusion. To reduce duplicative services and their fragmented delivery and improve on all aspects of our members' care and health outcomes, Health Net is committed to working with the LTSS programs that best know the beneficiary and have trusted relationships with those newly enrolled in managed care.

For purposes of coordinating and integrating LTSS into the health home, Health Net contracts with three distinct medical group models in LA County:









- 1) Partially delegated medical groups that rely on Health Net case management for our shared members. For medical groups that are not delegated to coordinate HCBS, Health Net care managers will facilitate and communicate all referrals and care coordination activities.
- 2) Fully delegated medical groups that provide the full array of basic case management services, while Health Net case managers provide complex case management.
- 3) Vertically integrated health care delivery models that include the provision of LTSS. Medical groups that are delegated to undertake care coordination, complex case management, and HCBS coordination have demonstrated that they can meet the rigorous delegation standards developed by Health Net's QI Program. These groups are continually monitored to ensure that care coordination includes the provision of appropriate resources to members and that care coordination and case management services are provided by appropriately credentialed staff.

Health Net has contracts with two vertically integrated medical groups, AltaMed and Universal Care Medical Group Health Plan dba Brand New Day (Brand New Day), that provide all-inclusive LTSS. See Attachment 20 for their letters of commitment to Health Net for the Demonstration.









- AltaMed: The integrated AltaMed model includes specialists, clinics, and their PCP-directed programs, including MSSP, CBAS, and PACE
- Brand New Day: Brand New Day's medical group model has a unique working relationship with the LA County Department of Mental Health in order to provide integrated health care services for people with SPMI. They employ clinical outreach staff, under the direction of their staff psychiatrists and psychologists, to ensure Health Net members receive necessary medical care and mental health treatment in the communities in which they live. This critical outreach program helps individuals not only access needed psychiatric therapies, but also integrates access to the myriad of other medical services they may need, such as diabetic care and cardiovascular care.

Through these three models, Health Net has combined the best practices of our Medicare D-SNP and Medi-Cal SPD programs, in conjunction with the HCBS programs, so that our members have optimal access to support services on a continuum that ensures they receive the right care, at the right time, in the right setting.









Section 2.1 LTSS Capacity

Describe how you would propose to provide seamless Question 2.1.1 coordination between medical care and LTSS to keep people living in their homes and communities for as long as possible.

By blending and enhancing the Medicare and Medi-Cal benefits covered under the Demonstration, Health Net will provide a seamless coordination of services to keep people in their homes and in the communities in which they live to the greatest extent possible. Working with LA Care, Health Net will develop a "no wrong door" approach, assisting members with all their HCBS program needs. Health Net's PCPs, case managers, and social workers will work in collaboration to develop an integrated care management plan that minimizes redundancies and duplication. Health Net's public programs administrators are working with their LA Care partners and HCBS providers to develop coordination of care procedures based on the Memoranda of Understanding (MOUs) that have been executed between the health plans and HCBS providers.

An example of this work is our partnership with CBAS programs in LA County to expand their responsibilities to include client-directed IHSS caregiver education, participation in acute hospital discharge planning, and working directly with PCPs and specialists to create seamlessly integrated care and treatment plans.









Building on Health Net's success integrating SPD members into Medi-Cal Managed Care, Health Net will continue to engage physicians and other providers in an education program to raise their competency and awareness to use programs that are an alternative to institutional care. Over the first two years of the Demonstration, Health Net will work with LA Care and the local Departments of Aging and Developmental Services to create a designation that identifies providers with advanced knowledge of, and working relationships with, HCBS providers.

Question 2.1.2 Describe potential contracting relationships with current LTSS providers and how you would develop a reimbursement arrangement.

Health Net and LA Care have met with numerous LTSS providers over the past months to gain insight and to begin the dialogue to explore developing reimbursement methodologies for these vital services. With assistance from Pacific Health Consulting Group and the Harris Center for Disability Health Policy, we have convened meetings with LA stakeholders representing IHSS, CBAS, MSSP, and AIDS Waiver programs. We have gained valuable insight and received commitments from each of these programs to first pursue an integrated approach to improve the care delivery of our shared Dual Eligible beneficiaries and, second, to identify areas of benefit duplication. As a result of recent legislation and the expansion of Medi-Cal Managed Care to include SPD beneficiaries, our









contractual relationship with CBAS will be in place before the Demonstration is launched. Health Net is working with California Association of Adult Day Services (CAADS) to develop a CBAS health home concept in LA that can be adopted by other health plans (see **Attachment 21**).

Taking this same innovative approach and building on our experience working with the MSSP and AIDS Waiver programs, we have begun laying the groundwork to pursue full integration and seek to establish a reimbursement methodology that would expand the availability of MSSP and AIDS Waiver slots for Dual Eligible beneficiaries.

If LA is selected as one of the Demonstration counties, Health Net and LA Care will work with the State In-Home Operations (IHO) program to identify opportunities to develop person-centered, integrated care delivery programs for our shared Dual Eligible beneficiaries. Health Net and LA Care realize that it is critical that these Dual Eligible beneficiaries with very complex conditions maintain their established provider relationships so that they can achieve their own goals to remain independent. Health Net and LA Care look forward to working with the State and IHO consumers to explore future reimbursement methodologies.









Health Net contracts with skilled nursing facilities (SNFs) on a per-diem basis to Medicare provide services Medi-Cal and members. Currently to our reimbursement for these services is limited to the terms of the Medicare benefit model and the Two-Plan contract provisions. We will conduct a thorough evaluation of all of the long-term care facilities being utilized by our Dual Eligible beneficiaries to develop rate methodology and reimbursement models that build on the current State methodology but are enhanced by the IDCT development of person-centered care planning.

Describe how you would use your Health Risk Assessment Question 2.1.3 Screening to identify enrollees in need of medical care and LTSS and how you would standardize and consolidate the numerous assessment tools currently used for specific medical care and LTSS.

Health Net's case managers evaluate and risk stratify all Dual Eligible beneficiaries to assess a member's needs and identify appropriate support services in conjunction with the member, caregivers, and treating physicians. This is especially true for activities of daily living, self-health care management ability, and available support systems. Health Net employs an IDCT approach to identify community services that are available to new members. Health Net case managers meet with new members and their caregivers to discuss the continuum of support services that may be beneficial in supporting independence.









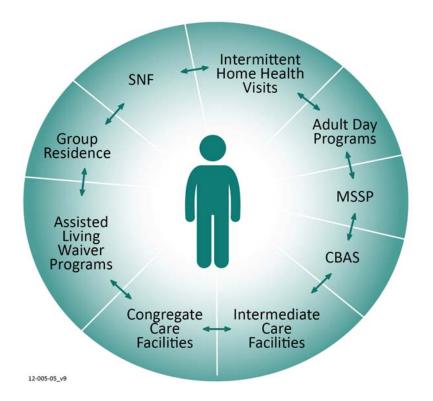
Health Net's IDCT will synthesize and consolidate existing health risk assessments (HRAs) and care plans completed by providers such as the Department of Public Social Services (DPSS) for IHSS determination, Regional Centers (Individual Family Service Plans), CBAS, mental health, and MSSP in order to avoid duplication and increase beneficiary satisfaction. With member permission, the consolidated case management plan signed off by the PCP will be distributed to the appropriate LTSS programs.

Question 2.1.4 Describe any experience working with the broad network of LTSS providers, ranging from home-and community-based service providers to institutional settings.

Health Net's MOC is built around an IDCT that has extensive experience working

with D-SNP members to refer **LTSS** them to programs. Building on this MOC, Health Net has incorporated lessons learned from the SPD expansion to include a comprehensive more approach to integrating

Figure 4. LTSS Care Continuum











the entire continuum of available services in the care management planning process. Health Net and LA Care are working with the LTSS programs to formalize a consistent person-centered approach to accessing needed services (see Figure 4).

Health Net recently partnered with CAADS and Independent Living Centers (ILCs) to develop an integrated care program with each of their respective providers to explore transition of care paradigms to and from a variety of institutional settings. Abstracts from the two grants are included in Attachment 21.

Describe your plans for delivering integrated care to Question 2.1.5 individuals living in institutional settings. Institutional settings are appropriate setting for some individuals, but for those able and wanting to leave, how might you transition them into the community? What processes, assurances do you have in place to ensure proper care?

Health Net recognizes that many Dual Eligible beneficiaries may desire to transition from State long term care institutions and private SNFs to homes in their local community. Health Net case mangers have extensive experience working to transition members from SNFs to home. For example, Health Net and LA Care have been working with DHCS to transition consumers from Lanterman Developmental Center to community group homes. Health Net has completed the successful transition of the first group of Lanterman residents into community









homes. These care plans include physician-delivered services at home; IDCT evaluations; and an integrated, person-centered care plan developed by the Lanterman staff, Regional Center case managers, and Health Net's case managers. Health Net's dedicated, on-site Regional Center liaisons played an integral role in orchestrating this very complex transition.

Health Net has adopted the comprehensive service plan of the California Community Transitions (CCT) program, which was implemented under a federal Money Follows the Person Rebalancing Demonstration beginning in 2007. Through the CCT program, consumers in inpatient facilities are provided an opportunity to be informed about, and discuss the feasibility of, receiving HCBS alternatives. The CCT comprehensive service plan is used to assess both preferences and needs to allow the development of a support system that will help ensure the member's health and welfare immediately after transition and for the long term. The comprehensive service plan is made up of seven service areas that create the foundation for a successful transition: health care, supportive, social, environmental, education/training, financial and other services. Health Net will work with the ILCs throughout LA County to explore the entire suite of services, including housing, that can be used to support a member's goal to transition from a custodial facility to an independent home environment.







Health Net acknowledges that many people may have gone from acute care settings to nursing homes without adequate, appropriate community-based services being offered. Upon enrollment, Health Net's IDCT will work with each Dual Eligible beneficiary living in a nursing home to determine if other living environments are wanted or feasible. For those beneficiaries who remain in

nursing homes, Health Net will work with the nursing home administration to

ensure that services are coordinated and integrated to meet the member's health

care needs.

Section 2.2 IHSS

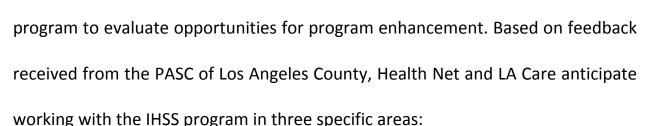
Health Net and LA Care understand the critical role that IHSS performs in the lives of many Dual Eligible beneficiaries. We are committed to maintaining the core tenet of this program: that caregiver services are and will remain member-directed. We also recognize that the success of the Demonstration for members with the most complex needs relies upon our ability to improve upon the IHSS system, while ensuring we do not fracture the system and disrupt members' abilities to receive needed IHSS services.

Health Net recognizes that without the successful coordination of IHSS, many Dual Eligible beneficiaries face institutionalization. During the first year of the Demonstration, both Health Net and LA Care will continue to work with the IHSS









- Explore contracting with the Public Authority for the enhanced provision of IHSS care providers in tandem with home health care providers
- Work with PASC, the Service Employees International Union (SEIU), and other
 LTSS providers to develop an HCBS training and credentialing model that
 promotes worker development
- Collaborate with LA Care to formalize our relationship with LA County DPSS
 through an MOU that includes developing managed care education programs
 for 700+ DPSS social workers and integrating their client evaluation in the
 member's case management plan to reduce redundancies and ensure effective
 coordination

Health Net's IDCT recognizes the complexity of the IHSS program and has experience working with IHSS through DPSS for both our D-SNP and SPD members. Health Net's case managers routinely reach out to the LA County DPSS on behalf of our members to initiate evaluations and request changes in their hour allotment at critical transition of care junctures. This is especially true when









members are discharged from acute facilities and during the creating of the initial care plan when members are first enrolled.

Certify the intent to develop a contract with the County to Question 2.2.1 administer IHSS services, through individual contracts with the Public Authority and County for IHSS administration in Year 1. The contract shall stipulate that: -IHSS consumers retain their ability to select, hire, fire, schedule and supervise their IHSS care provider, should participate in the development of their care plan, and select who else participates in their care planning. - County IHSS social workers will perform assessments using the Uniform Assessment and guided by the Hourly Task Guidelines, authorize IHSS services, and participate actively in local care coordination teams. - Wages and benefits will continue to be locally bargained through the Public Authority with the elected/exclusive union that represents the IHSS care providers. - County IHSS programs will continue to utilize procedures according to established federal and state laws and regulations under the Duals Demonstration. - IHSS providers will continue to be paid through State Controller's CMIPS program. - A process for working with the County IHSS agency to increase hours of support above what is authorized under current statute that beneficiaries receive to the extent the site has determined additional hours will avoid unnecessary institutionalization.

Health Net certifies the intent to develop a contract with the County to administer IHSS services, through individual contracts with the Public Authority and County for IHSS administration in Year 1. This contract shall stipulate that IHSS consumers will continue to retain the ability to select, hire, fire, schedule, and supervise their IHSS care provider. In addition, IHSS consumers would participate in the development of their care plan, and select who else participates in their care planning. Health Net and LA Care will work in collaboration to coordinate IHSS benefit administration. The contract agreement will include that:









- County IHSS workers will perform assessments using the Uniform Assessment guided by the Hourly Task Guidelines and authorized IHSS services—and participate actively in local care coordination teams. Health Net will develop a process with the county to allow information sharing on the care needs of the consumers.
- Wages and benefits will continue to be locally bargained through the Public Authority with the elected/exclusive union that represents the IHSS care providers.
- County IHSS programs will continue to utilize procedures according to established federal and state laws and regulations under the Demonstration.
- IHSS care providers will continue to be paid through State Controller's CMIPS program.
- We will develop a process for working with the county IHSS agency to increase hours of support above what is authorized under current statute that beneficiaries receive, to the extent the site has determined additional hours will avoid unnecessary institutionalization.









Question 2.2.2 With consideration of the LTSS Framework in Appendix E, that emphasizes customer choice, and in consideration of the approach taken in Year 1 as described above, please describe the interaction with the IHSS program through the evolution of the Demonstration in Years 2 and 3. **Specifically address:**

During the implementation period prior to the start of the Demonstration, Health Net will work with LA Care to execute an MOU to coordinate services with DPSS. A draft MOU that includes coordination standards is included in Attachment 18. In Year 1, Health Net intends to collaborate with LA Care and fund DPSS to train Health Net and LA Care case managers and social workers about the IHSS program, including the IHSS Uniform Assessment tool and the Hourly Task Guidelines. Working with IHSS, an integrated case management plan will be developed with IHSS input that will include the IHSS Uniform Assessment. Case managers will update the plans quarterly and forward changes to the DPSS social workers. Health Net will assign a liaison to work with DPSS to conduct quarterly reviews of members who require intensive case coordination to avoid possible institutionalization and to address concerns and barriers to the successful implementation of member-caregiver relationships.

Based on lessons learned in Year 1 of the Demonstration, starting in Year 2 and continuing in Year 3, Health Net will work towards developing a reimbursement methodology for IHSS hours provided to Health Net members.









In collaboration with PASC, Health Net and LA Care will jointly develop an HCBS training and credentialing model. Findings from numerous surveys and focus groups of paraprofessional direct care workers consistently identify lack of adequate training as both a concern and a factor influencing workers decisions to stay in the field. Health Net's Health Education and Provider Communication teams will work with LA Care and PASC to organize an ongoing schedule of trainings for formal and informal caregivers addressing core competencies in geriatrics; soft skills (e.g., listening, communication, empathy, decision-making, personal time management, etc.); cultural competency; and an understanding of complex chronic conditions, multi co-morbidity complications, and the unique needs of individuals with dementia and Alzheimer's disease. Health Net, in collaboration with LA Care, will work with local agencies, including the Area Agencies on Aging (AAAs), the Caregiver Resources Centers, Alzheimer's Association, the LA County Department of Mental Health, and the CBAS programs, to develop a curriculum that includes:

- Essentials of caregiving and caregiver support
- Transfers and the body mechanics of
- Advanced care planning and endof-life needs
- Recognizing behavioral health









caregiving

- Managing hygiene and the activities of daily living
- Community resources
- Challenges of Alzheimer's and dementia care

concerns and de-escalation

techniques

- Caregiving as a successful career
- Nutrition training for caregivers
- Recognizing and reporting elder abuse and neglect
- Emergency preparedness

Health Net has a commitment from many of the CBAS programs in LA County to provide these trainings collaboratively at their sites (the CAADS grant abstract is included as Attachment 21). Health Net will coordinate with the Public Authority to triage the need for personal attendant coverage with our members to identify alternative caregiver resources to ensure member safety. This emergency system plan will include short-term CBAS access, if needed. In extreme cases this may include facility-based services. We believe that these kinds of short-term arrangements will ultimately contribute to the overall welfare and independence of our members.

Section 2.3 Social Support Coordination

Health Net and LA Care will develop MOUs with LTSS programs that support our integrated MOC. These MOUs will include a service coordination model, along









with a provision for ongoing case management training, to ensure that the health plan case managers have a working knowledge of available resources. This is critical in order to adapt to the ever-changing landscape of the provision of LTSS.

Question 2.3.1 Certify that you will provide an operational plan for connecting beneficiaries to social supports that includes clear evaluation metrics.

Health Net certifies that it will provide an operational plan for connecting beneficiaries to social supports that include clear evaluation metrics. HCBS eligibility criteria will be used when making recommendations to members and their caregivers about services available to them that support both health and independence. This is especially true for CBAS services and services provided by the AAAs and other social support programs. These evaluation tools and metrics will be an integral part of the overall case management plan and will be made available to the PCP and the HCBS program(s). An example of this is a referral to a CBAS program for a member who needs continuous cueing to self-feed.

Describe how you will assess and assist beneficiaries in Question 2.3.2 connecting to community social support programs (such as Meals on Wheels, CalFresh, and others) that support living in the home and in the community.

Health Net recognizes that the MSSP program model developed in the communities where our members live is one of the most efficient ways to orchestrate available resources.









Health Net will adopt the MSSP methodology and standards in our IDCT reviews of institutionalized members and members at risk of institutional care. This very successful program currently has limited access. Health Net and LA Care will work with the AAAs and local MSSPs to explore options to increase capacity. Where available and appropriate, Health Net will contract with local existing MSSPs to assess and assist beneficiaries in connecting to community social support programs.

Describe how you would partner with the local Area Agency Question 2.3.3 on Aging (AAA), Aging and Disability Resource Connection (ADRC), and/or **Independent Living Center (ILC).**

Health Net and LA Care share a common understanding of the challenges that seniors encounter in striving to remain active and independent in their communities. This is especially true when it comes to managing the health care conditions related to aging (e.g., dementia, impaired mobility, falls, nutrition, etc.). We also recognize that not all AAAs provide the same scope of services. It is our intent to use assigned public program liaisons to participate at the local level to help resolve chronic access to care issues.

Health Net has been a member of the California Area Agency on Aging Association (C4A) Corporate Advisory Board for five years. During this time we have worked with the AAA programs to enhance our understanding of their









programs that are available to our members. Health Net will create culturally relevant caregiver materials and provide health education programs in senior centers and AAA-sponsored events using a promotoras/mentoring model. Health Plan education materials will be made available to their aging and disability resource connection along with nutrition support programs like Meals on Wheels.

Representatives from Health Net also are members of the boards of two ILCs. In January 2012, Health Net worked with five of the seven ILCs in LA County— Westside Center for Independent Living (WCIL), Community Rehabilitation Services (CRS), Disabled Resource Center, Inc. (DRC), Southern California Rehabilitation Services (SCRS), and Independent Living Center of Southern California (ILCSC)—on a CMS Innovations grant proposal, "Bridging Health Navigation and ILC Program Coordination." Health navigators at ILCs would help consumers with a variety of disabilities navigate the health care delivery system with the aim of promoting wellness and improving health outcomes. The program would integrate and coordinate health and ILC program services - including medical services, health education, health care self-management, mental health, transition services, daily living activities, job development, housing resources, peer support and assistive technology – in a person-centered setting that bridges health and ILC program coordination.









Question 2.3.4 Describe how you would partner with housing providers, such as senior housing, residential care facilities, assisted living facilities, and continuing care retirement communities, to arrange for housing or to provide services in the housing facilities for beneficiaries.

Health Net and LA Care are collaborating to develop a coordinated approach to working with the spectrum of housing providers to coordinate services in the housing facilities. Health Net will assign a liaison to facilitate partnerships with residential care facilities, assisted living facilities, and continuing care retirement communities. Based on data from member assessments and stratification of member needs, Health Net will work with HCBS and these housing providers to deliver health care services, such as physician visits, in these settings. We currently have members who participate in the Assisted Living Waiver program who would benefit from health promotion programs delivered in these communities. Over the next two years with the help of the AAAs and HCBS programs, we will develop a directory of the senior housing programs by zip code that partner with Health Net. This will facilitate a beneficiary's ability to identify health care programs that are made available through Health Net at each site. We will also develop policies, procedures, and training for case managers, the IDCT, and contracted PPGs regarding housing services and home modification programs available to members.









Section 3. Coordination and Integration of Mental **Substance Use Services**

Question 3.1 Describe how you will provide seamless and coordinated access to the full array of mental health and substance use benefits covered by Medicare and Medi-Cal, including how you will:- Incorporate screening, warm hand-offs and follow-up for identifying and coordinating treatment for substance use.- Incorporate screening, warm hand-offs and follow-up for identifying and coordinating treatment for mental illness.

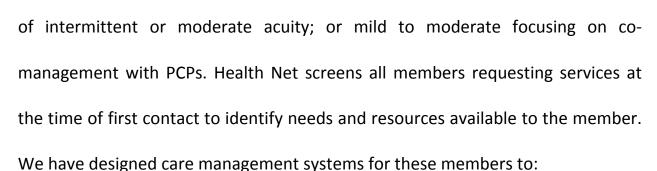
Health Net will achieve full integration of behavioral health services in a combined Medicare and Medi-Cal benefit by January 1, 2015 resulting from our extensive experience working with traditional Medicare and Medi-Cal members. Health Net, through its sister company MHN, Inc., (hereinafter referred to as Health Net) currently provides behavioral health services through an extensive practitioner network to our Medicare members. The delivery of behavioral health services to our Medi-Cal members is provided cooperatively between Brand New Day and LA County Department of Mental Health. Through the combined efforts of these two delivery models, we intend to provide comprehensive behavioral health services for the Dual Eligible beneficiaries to ensure integration of all elements of individualized care.

Through Health Net's experience coordinating care for Medicare patients with mental illness and substance use disorders, regardless of whether the member's impairment is profound, severe, and persistent with complex psychosocial needs;









- Improve access to care by evaluating provider network adequacy, appointment availability statistics, and member satisfaction.
- Improve continuity of care and services by coordinating with medical providers,
 county behavioral health resources, and the full range of providers throughout
 our system of care. We share accountability for successful treatment outcomes
 with these partners and the member who is receiving services. This
 coordination leverages home and community-based alternatives to promote
 member directed treatment in the least restrictive setting possible.

Health Net's IDCT has been managing D-SNP members with complex medical, social, and psychiatric needs since 2009. Our clinical care managers have experience working with the County mental health providers to coordinate services for members with psychiatric and substance abuse issues. We coordinate services for our members who attend Medi-Cal-funded day programs, in conjunction with their Medicare-funded mental health services. We have also interacted with county mobile crisis intervention teams for many years and rely







upon their psychiatric and social expertise available to our members during times of crises.

Health Net's provider network is comprised of licensed professionals with expertise in providing specialized, evidence-based services to Medicare Advantage and SNP members. We will work to expand our network to include the County behavioral health network of service providers, as appropriate, to ensure:

- Continuity of care for members currently receiving services within the County mental health system of care
- Access to the clinical expertise and experience of these providers
- Continued access to services that are available through the LA County Mental
 Health system of care, including crisis intervention and day programs

As members move through this integrated system of care, our focus will be on coordinating transitions of care, particularly for members with complex and persistent medical and behavioral health needs. Health Net's IDCT behavioral health clinicians will work to ensure timely referral, coordination, and warm transfers to help our members direct their care and access HCBS programs in their communities.









Working with LA Care and the County Department of Mental Health, we will fully integrate the Medicare and Medi-Cal benefits into one comprehensive system of care to achieve optimal health outcomes.

- We currently have specialized case management programs that work with the IDCT to coordinate, monitor, evaluate, and use a variety of collaborative service providers to meet specific complex needs of members affected by mental illness and chronic substance use
- We coordinate, facilitate, and manage the development and ongoing support of collaborative partnerships among consumers, providers, County agencies, community-based organizations (CBOs), and individual medical and behavioral health practitioners to ensure effective comprehensive mental health and substance use services are designed to strengthen recovery and resiliency
- Our direct interactions with members include assistance in accessing and navigating service systems

We identify members in need of services by reviewing the HRAs performed on each new member, pro-actively identifying members for outreach who would benefit from the IDCT's coordinated physical and behavioral health approach to care. Our dedicated Member Services Center representatives also respond to calls









from members concerning referrals, appointments, and assistance with other health care concerns.

Health Net publishes and recommends use of standardized screening tools and standardized, evidence-based practice guidelines in behavioral health treatment to our network providers. These are tools that can be used by both behavioral health and medical practitioners.

Question 3.2 Explain how your program would work with a dedicated Mental Health Director, and/or psychiatrist quality assurance (preferably with training in geriatric psychiatry)

We will commit to a dedicated Mental Health Director to manage the Demonstration who will have experience working in both the private and public sectors serving Dual Eligible beneficiaries. The Mental Health Director will be a California licensed behavioral health professional—preferably with training in geriatric psychiatry—with experience in the following:

- Clinical and administrative experience working with Dual Eligible beneficiaries
- Demonstrated expertise in the design, development, implementation, and management of Behavioral Health Recovery Model programs
- Extensive knowledge of the Mental Health Services Act (MHSA) and its requirements and evidence-based behavioral health treatment









 Behavioral health care management, including experience with Quality Improvement/Quality Assurance

We will develop a collaborative working relationship with the experienced LA County behavioral health practitioners to enhance coordination of services.

Question 3.3 Explain how your program supports co-location of services and/or multidisciplinary, team-based care coordination.

Health Net currently works with PPGs and clinics within LA County that colocate behavioral health practitioners in medical settings in order to appropriately assess behavioral health needs of medical patients and facilitate transitions in care. We will work to identify opportunities to increase the number of settings providing co-located services. Staffing primary care clinics with licensed behavioral health clinicians allows:

- Seamless continuity of the member's assessment/evaluation process
- The behavioral health clinician to initiate coordination of care and appropriate mental health/substance use referrals, including crisis intervention, medication support, and case management when initial screening identifies risk for a member
- Warm hand-offs for members transitioning between practitioners, treatment settings, and levels of care in order to support member engagement and continuity of care









 On-site case coordination to ensure that quality measures are met, providing care in the least restrictive setting, member engagement in care, continuity of care, and facilitate transitions of care

Health Net supports the concept of the recovery model and delivery of a person-centered, family focused system of mental health and substance use disorder services to promote wellness, eliminate stigma, and remove barriers to recovery with the belief that members with mental health and substance use disorders can lead productive lives.

In our co-location service settings we will encourage Integrated Screening, recommended by Substance Abuse & Mental Health Services Administration (SAMHSA) to address both mental health and substance use problems.

Behavioral health professionals and other health and social professionals working together on an IDCT as treatment partners to our members are able to leverage their expertise to develop effective treatment plans and strategic interventions to improve patient care. This coordinated approach will be critical to meeting the goals of this Demonstration by delivering the best patient care with seamless coordination of needed services.









Question 3.4 Describe how you will include consumers and advocates on local advisory committees to oversee the care coordination partnership and progress toward integration.

Health Net and LA Care's initial plan will be to engage with existing structures and forums, drawing on the expertise of the LA County Mental Health Commission, local California Alliance for the Mentally III (CAMI), and consumer stakeholder groups, to engage consumers and advocates on the design, development, and implementation of a consumer-driven Demonstration Mental Health Advisory Committee. Working with LA Care, we fully expect, will allow us to accomplish consumer and advocate partnerships. We will develop additional opportunities for feedback and engagement if we believe that this will improve the quality of our services. Greater consensus on what constitutes appropriate care delivery, appropriate continuity of care for members, and compliance with recommended treatment plans would all be enhanced by the support of these stakeholders, leading to better outcomes for members in this person-centered, recovery model. Health Net is committed to developing, partnering with, and promoting educational and advocacy programs run by a partnership of consumers and professionals with the goals of empowerment, stigma reduction, wellness, advocacy, and education regarding mental health and substance use disorders.









Section 3.2 County Partnership

Health Net and LA Care first collaborated with the LA County Department of Mental Health to develop a comprehensive agreement for services for our Medi-Cal Managed Care beneficiaries over 15 years ago. The LA County Demonstration will advance our continuing collaboration to focus on building a person-centered, fully integrated, recovery-focused MOC.

Describe in detail how your model will support integrated Question 3.2.1 benefits for individuals severely affected by mental illness and chronic substance use disorders. In preparing the response, keep in mind that your system of care may evolve over time, relying more heavily on the County in Year 1 of the Demonstration. (See Appendix G for technical assistance on coordinating and integrating mental health and substance use services for the seriously affected.)

Health Net, LA Care, and the LA County Department of Mental Health recognize the unique challenges that persons with SPMI encounter accessing health care services. A key to our MOC is the early identification of members in need of services using the HRA and subsequent development of an individualized care plan. Health Net behavioral/mental health specialists and drug/alcohol therapists are an integral part of the IDCT for members who have behavioral health conditions, chronic substance use disorders, and SPMI. Developing a framework for integrating the County Department of Mental Health delivery system providers with the ICDT for members who are receiving services from County





health home provider.



providers is a Year 1 priority for Health Net. Our Mental Health Director and case managers will work with the LA County Department of Mental Health to develop an integrated care management plan to be approved by the member's designated

The following approach outlines how Health Net will develop an integrated benefit for individuals severely affected by mental illness and chronic substance use disorders. The three key elements are: 1) an integrated administration strategy that builds on our existing MOU with the LA County Department of Mental Health (in collaboration with LA Care) to assign dedicated mental health case managers at the County mental health hubs to coordinate a "no-wrong door" approach to accessing behavioral health services, 2) develop an integrated care delivery system supported by a web-based, easily accessible, joint health plan behavioral provider directory, and 3) by Year 3, develop an integrated payment approach that combines both LA County Department of Mental Health and Medicare benefit structures in a seamless delivery and reimbursement system.

1) Integrated Administration Strategy: Integrated administration of the dual Medicare/Medi-Cal benefit will require a close partnership among multiple entities – Health Net, LA Care, and LA County Department of Mental Health.









Health Net and LA Care will consult consumer and advocacy groups, along with state and federal agencies, that have broad experience developing and delivering programs and services for individuals with SPMI and chronic substance use disorders to gain insight into which elements of the current system of care are working and which elements need to be improved. With stakeholder input, Health Net will evaluate existing program resources, both in and out of our network, to identify gaps in the current system of care. We will further refine the role of Health Net and LA Care's liaisons to focus on streamlining member communications to ensure that members do not experience interruptions in care and that provider continuity is maintained. We will also evaluate the existing system controls, including quality management and utilization management processes, for services currently being received by members. We will objectively and systematically monitor and evaluate the quality and safety of clinical care provided to members, as well as the accessibility and appropriateness of patient care and the performance of practitioners.

2) Integrated Care Delivery System: Having developed productive partnerships with the consumer community, the LA County Department of Mental Health, and the contractors who provide services through contracts with the County,









Health Net, in collaboration with LA Care, will administer an integrated care delivery system. Health Net care management will include utilization review, quality improvement, intensive case management, and disease management. In an integrated care delivery system, the IDCT uses a collaborative, multidisciplinary approach that is client-focused, interactive, and goal-directed in the development, implementation, and monitoring of the plan of care. This ensures members are receiving the correct level and intensity of care linked to their clinical status at the appropriate level on the continuum of services. This ranges from acute inpatient, intermediate levels of care such as Partial Hospital (Day Treatment), to intensive outpatient structured programs, as well as traditional outpatient office based care to address both mental health and substance use disorders. Health Net also endorses the recovery model and recognizes that comprehensive services focused on the goal of ongoing recovery are imperative. The goal is to move service delivery away from the acute hospital setting to community based services, resulting in better health outcomes, better quality of life, and the lowering of health care costs.

3) Integrated Payment Approach: The challenge and opportunity of this

Demonstration is to combine the various funding streams and benefits that are
available to our members. Health Net has extensive experience contracting









with a variety of mental health providers who offer a wide array of services, including facilities (inpatient psychiatry, inpatient substance abuse detox and rehabilitation, partial hospital programs, and intensive outpatient programs). After thorough evaluation of our current behavioral health network, Health Net will contract with existing County program resources that may not already be in our network. This will include outpatient structured programs, as well as outpatient office-based care for both mental health and substance use disorders. We will also formalize clinical practice guidelines and best practices regarding these services using evidence based practice and the robust experience of those currently providing services. Health Net will also explore incentive payments for meeting outcome and performance measures for successful integration and care coordination.

Health Net recently contracted with a specialized integrated mental health service provider in LA County, Brand New Day. Brand New Day has a unique working relationship with the LA County Department of Mental Health to provide health care services for members with SPMI. Through their medical group model they employ clinical outreach staff under the direction of their staff psychiatrists and psychologists to assist their members with medical care and mental health treatment programs in their communities and homes. This critical outreach









program helps members access not only needed psychiatric therapies but also integrates access to the myriad of other services they need (e.g., diabetic care, cardiovascular care, etc.) In this way they function as a vertically integrated delivery system that has developed the special expertise to provide a personcentered health home designed around the needs of members with SPMI.

Question 3.2.2 Provide evidence of existing local partnerships and/or describe a plan for a partnership with the County for provision of mental health and substance use services to the seriously and persistently ill that includes measures for shared accountability and progress toward integration in the capitated payment by 2015. Describe how you will work with County partners to establish standardized criteria for identifying beneficiaries to target for care coordination. Describe how you will overcome barriers to exchange information across systems for purposes of care coordination and monitoring.

Health Net has worked collaboratively with LA Care for the last 15 years to develop agreements with public health programs, Regional Centers, and the LA County Department of Mental Health to adopt coordination of care policies and procedures to ensure access to these programs. Health Net will collaborate with LA Care and expand upon our existing MOUs with the LA County Department of Mental Health to include an integrated case management and care coordination program that spells out how we will jointly arrange and provide services to the Demonstration members. This MOU will also include measures for shared accountability and progress toward full payment and service delivery integration by 2015. A copy of the current MOU is included in **Attachment 19**.









Health Net's mental health clinicians will collaborate with the LA County Department of Mental Health clinicians and LA Care clinicians to establish standardized criteria for identifying beneficiaries in need of care coordination. These criteria will be based on information from:

- Claims data, including pharmacy data, that includes the member's past history of diagnosis and treatment
- Results from the current screening and evaluation tools used to determine SPMI and chronic substance use status
- Applied InterQual criteria from utilization data
- Available LA County Department of Mental Health provider treatment data Evaluation of this data will determine which beneficiaries will be prioritized for a full assessment of their current symptoms, functioning, social supports, treatment, substance use, medications, and co-existing medical conditions in the expedited development of care coordination plans.

The LA County Department of Mental Health has overcome barriers to exchanging information for purposes of care coordination and has established a system that informs both Health Net and LA Care of our members who are receiving mental health services. This allows Health Net to assign case managers with specialized skill and experience with SPMI to these members. Health Net will









work with the LA County Department of Mental Health to expand this data sharing by building an on-line presence that would allow physical and behavioral health care providers, Health Net and County administration, as well as consumers of services, to access and share relevant information with one another. This undertaking would require the establishment of clear data sharing/privacy guidelines to facilitate information exchange and protect personal health information as well as consensus on sharing of all data, including pharmacy data with stakeholder buy-in and collaboration. Health Net, LA Care, and LA County Department of Mental Health will engage with advisory and consumer groups to develop a task force to develop information sharing safeguards that will facilitate integration and development of case management services for members.

Section 4. Person-Centered Care Coordination

Health Net's care coordination and case management programs have been developed over the last 27 years to meet and surpass the expectations of the Medi-Cal Managed Care Division (MMCD), as well as those of the members we serve. Our D-SNP MOC offers a person-centered care coordination approach. In 2011, Health Net's SNP MOC was granted the maximum three-year approval. We have developed a culturally diverse and dedicated case management and other







clinical staff who live and work in the same communities as our members. Through this local presence, we are able to effectively respond to our members' needs as they are identified. This model has contributed to the successful transition of over 65,000 SPD members to our Medi-Cal Managed Care program. The IDCT described below builds on our current experience managing and coordinating care for our SPD members and on our D-NSP MOC.

Question 4.1 Describe how care coordination would provide a person-centered approach for the wide range of medical conditions, disabilities, functional limitations, intellectual and cognitive abilities among Dual Eligibles, including those who can self-direct care and also those with dementia and Alzheimer's disease.

The Dual Eligible population is culturally diverse, and it will include members with a wide range of medical conditions, disabilities, functional limitations, and intellectual and cognitive abilities, including members with dementia and Alzheimer's. We also recognize the importance of providing care coordination across the full continuum of a member's needs to avoid duplication of services and to enhance the member's health home. To this end, our integrated personcentered care management system of ambulatory case management, complex case management, disease management, and home and community-based care coordination will be directed by the members and/or their caregivers to the greatest extent possible with the resources of Health Net's IDCT. Health Net's









IDCTs are linked to our PPGs and are geographically based throughout LA County based on our membership distribution.

Based on the results of the initial HRA, members are connected to the appropriate IDCT. Key to the success of any care management program is the member's understanding, knowledge, and trust of the available health care and HCBS programs. Equally important is our members' ability to access these services. Therefore, a central goal of our care management model is to help our members meet their health care goals to enable them to attain their highest level of independence and stay in their homes as long as possible. To achieve this result in LA County, our IDCT of medical directors, nurses, social workers, mental health clinicians, pharmacists, and case management assistants live and work in LA.

To ensure that our Dual Eligible beneficiaries have ready access to IDCTs, in targeted areas they will be comprised of locally recruited, culturally diverse clinical and clinical support staff co-located in high-volume clinics, hospitals, and medical offices. Their goal is to help our Dual Eligible beneficiaries navigate the health care system and collaborate with the other HCBS programs to meet their health goals. Individuals on the IDCT will be assigned to serve as a personal point of contact to help our most frail and vulnerable members navigate the myriad of health care services and programs. These assignments are made with member









input and permission and are based on the results of HRAs and IDCT care conference recommendations.

IDCTs work with the member and the member's providers to develop a care management plan that includes ongoing treatment and focuses on removing barriers to attaining health goals and reducing the need for institutional care. They collaborate with HCBS programs to identify gaps in social service needs, including assessing environmental situations that could put the member at risk for injury, including abuse or neglect. The services provided by the IDCTs will include:

- Serving as the key point of contact to the member or the member's caregiver to help them understand benefits and how to access them
- Facilitating comprehensive medical evaluations by assisting with making provider appointments
- Conducting HRAs to screen for complex case management, disease management, and ambulatory case management
- Coordinating with LTSS, IHSS, HCBS, CBAS, and other county agencies
- Coordinating supplemental benefits
- Assessing members in nursing facilities for their ability to return to a home setting









- Reviewing medication regimens and recommending improvements to drug therapy
- Identifying members with mental health needs and ensuring linkages to behavioral health services are facilitated

As our attached MOC points out, it is estimated that over 43 percent of Dual Eligible beneficiaries have at least one mental/cognitive condition. This critical strength of our case management/care coordination team is vital to the development of an integrated care management plan that maximizes our members' ability to attain their health goals. When appropriate, mental health clinicians are assigned as the member's IDCT point of contact to assist with all of his or her health care navigation challenges. Health Net's mental health clinicians will be working with their LA County Department of Mental Health counterparts to coordinate member-specific services and work collaboratively to ensure that barriers to receiving mental health services are mitigated in real time.

Question 4.2 Attach the model of care coordination for Dual Eligibles as outlined in Appendix C. This will not account against any page limit.

The MOC is attached as **Attachment 4**.









Question 4.3 Describe the extent to which providers in your network currently participate in care coordination and what steps you will take to train/incentivize/monitor providers who are not experienced in participating in care teams and care coordination.

Our goal is to preserve beneficiary choice while contracting with PPGs that meet the qualification requirements outlined in **Section 7**. By building on our current experience, we are able to choose from a wide range of PPGs. It is our expectation that our PPGs will be experienced in both Medicare and Medi-Cal and will meet care coordination and case management requirements. We currently contract with 68 PPGs in LA County (3,450 PCPs; 3,490 behavioral health providers; and 7,450 specialists). We will be conducting readiness reviews on all of the PPGs and selecting for the Demonstration PPGs that best fit the needs of the Duals Eligible beneficiaries. Currently, 31 PPGs are fully delegated for D-SNP care coordination and case management. Provider training on different aspects of the Dual Eligible MOC will be offered online through the provider portal, inperson, and via teleconferences. Trainings will emphasize, among other topics, care coordination and case management, medication therapy, transition of care management, care plan development, and implementation.

We will be providing a combination of grants, incentives, and project management support to move PPGs to the health home model, which follows the whole-person approach to care by integrating medical, behavioral, and social









supports, and by linking members to available community-based resources (see Section 7.2).

Monitoring will be done annually using the same NCQA criteria and CMS guidelines currently used to monitor our D-SNP program. The Delegation Oversight team will review the Dual Eligible MOC functions during the annual onsite audit, including MOC training. Health Net will ensure that PPGs will complete necessary training.

Section 5. Consumer Protections

Health Net will ensure the consumer protections described in this Section. In particular, at the initiation of the Demonstration, Health Net will offer significantly expanded provider choice by collaborating with LA Care in LA County. Health Net will also leverage its experience managing a person-centric MOC for both the D-SNP population (using individualized care planning and IDCTs) and the SPD population to ensure that self directed, well coordinated care is the central concept in the Demonstration.









Question 5.1 Certify that your organization will be in compliance with all consumer protections described in the forthcoming Demonstration Proposal and Federal-State MOU. Sites shall prove compliance during the Readiness Review.

Health Net certifies that we will be compliant with all consumer protections described in the RFS and Federal and State MOUs and we will prove compliance during the Readiness Review process.

Section 5.1 Consumer Choice

By leveraging the Medi-Cal Two-Plan Model, using the current infrastructure, and expanding the beneficiaries' choice and access they are provided with a wide range of provider choices through the health plans.

In the Demonstration, beneficiaries are connected with the appropriate PCPs and specialists of their choice to ensure they have access to medications, durable medical equipment (DME) and treatments without delay or disruption. There are key touch points for our members in the enrollment process, including the onboarding process through our Member Services Center, the HRA outreach process, enrollment in disease management and case management where Health Net will ensure members have the information to make appropriate provider choices. Our Member Service Center staff and case managers will assist members with provider assignment and authorization for ongoing specialty care.









In addition to written and telephonic information on benefits and member rights, Health Net anticipates that we will collaborate with LA Care in conducting periodic town hall meetings at locations throughout LA County. Town hall meetings will provide beneficiaries and their caregivers with the opportunity to engage with health plan representatives who can answer questions about the Demonstration, provider choice, service integration, care coordination, benefits, and access to care. These town hall meetings will be offered in different venues reflective of member diversity, including physical accessibility, cultural, cognitive, and linguistic needs.

Describe how beneficiaries will be able to choose their Question 5.1.1 primary provider, specialists and participants on their care team, as needed.

Members will continue to access their current primary and specialist physicians. Our goal is to facilitate smooth transitions with as little care disruption as possible. We will provide Dual Eligible beneficiaries with the same continuation of care benefits offered to SPD members, who may be treated by a non-participating provider for medically necessary services for up to 12 months from the date of their enrollment. During this time, the medical group or case manager works with the member to ensure a coordinated transfer to an in-network provider. Health Net requires all subcontracting health plans and PPGs to adhere to the SPD continuation of care policy and arranges for medically necessary services for









members to be provided by non-participating providers as appropriate. Members choose from over 3,450 PCPs, 3,490 behavioral health providers, and 7,450 specialists in the Health Net LA County network. Network expansion is ongoing to improve physician choice, enhance continuity of care, and meet provider availability standards.

For members who do not have a PCP, or want health plan guidance, our provider directory is available in hard copy and online in threshold languages; the directory also includes physical accessibility symbols to allow members to select provider offices that can accommodate their physical needs. Additionally, our Member Services Center can link members to a provider that meets their cultural, linguistic, and physical accessibility needs.

Dual Eligible beneficiaries and/or their caregivers are contacted by case managers to assist in the identification of the IDCT participants. The IDCT is a core component of our member centric approach to care. Case managers also invite members and/or their caregivers to participate in any ongoing IDCT meetings.

Describe how beneficiaries will be able to self-direct their Question 5.1.2 care and will be provided the necessary support to do so in an effective manner, including whether to participate in care coordination services.

Self-directed care is a key feature of the Health Net person-centered model of care. During the HRA process, members are informed that participating in any of









our case/care programs is their choice. If a member does not choose to participate in case management, assistance is still available through the Member Services Center, chronic disease management programs, educational and quality improvement programs, and the 24/7/365 Nurse Advice Line. Members may request case management services through their providers, HCBS plan partners, or our Member Services Center at any time.

This all-encompassing program of care for Dual Eligible beneficiaries cannot be designed and implemented in a vacuum. We seek the input and guidance from our external Duals Advisory Committee to create a meaningful program of person-centered care, linking primary and specialty care, HCBS, and mental health services through the IDCT case management program of health navigation.

Section 5.2 Access

Question 5.2.1 Certify that during the readiness review process you will demonstrate compliance with rigorous standards for accessibility established by DHCS.

Health Net certifies that it will demonstrate compliance with rigorous standards for accessibility established by DHCS during the Readiness Review process.









Question 5.2.2 Discuss how your program will be accessible, while considering: physical accessibility, community accessibility, document/information accessibility, and doctor/provider accessibility.

Physical access is assured by Health Net's site assessment process. During the mandatory transition of SPD members to managed care, Health Net established a system of facility site reviews (FSRs) in collaboration with LA Care and the Harris Family Center for Disability Issues and Health Policy to ensure physical access to provider sites for all members including aging members and members with The collaborative disabilities. review process developed for the SPD implementation will continue to be used for the Demonstration. The Physical Accessibility Review Survey (PARS) tool is used to assess contracted providers' sites for accessibility. Accessibility to medical offices generally includes designated parking spaces, exterior building access, such as ramps, and interior building access, such as elevators, restrooms, exam rooms, and specialized equipment. During Health Net's FSR and PARS process, a finding of any obvious physical barrier to accessibility for members with disabilities is noted and discussed with the provider or PPG administrator. Sites are designated either Basic (all elements are present) or Limited (one or more element is missing).

Community access is promoted through Health Net's work with local CBOs to ensure coordinated member access to local programs and resources to meet the









member's medical, behavioral, and social needs. Many of the following services and programs are administered by the local AAA. At a minimum, Health Net will collaborate with organizations, including:

- CBAS (Adult Day Health Care) provides health, therapeutic, and social services to the frail elderly and functionally impaired adults at risk of institutionalization
- Alzheimer's Day Care Resource Centers provide care for persons with Alzheimer's disease and other related dementias who are often unable to be served by other programs. The Centers provide respite, training, and support for families and professional caregivers
- Local Brown Bag Volunteer Programs, Congregate Meals and Home Delivered Meals provide food services
- Information & Assistance provides trained staff to provide information as well as assistance and follow-up to link older persons and their families to specific community services
- In-Home Services, Respite Purchase of Service, Respite Registry **Transportation Services** provide in-home supportive services and respite care for caregivers

Access to documents and information such as enrollment rights and options, plan benefits and rules, and care plan elements is ensured by the use of a variety









of formats and languages accessible to enrollees. Health Net translates key documents and information material into threshold languages in LA County and has the capacity to provide information in a variety of formats described in this Section under Education. To make information exchange easier and to meet the unique needs of members and providers, Health Net operates a Member Services Center with dedicated associates for Dual Eligible beneficiaries. These dedicated associates are trained on the D-SNP MOC, including benefits and the provider network to effectively assist members and providers. The Member Services Center contact information is included on the member's ID card. In addition, Health Net providers and members have access to telephone interpreter support in over 100 languages for immediate access to interpretation. Educational material is also highly accessible.

Provider access is ensured by a comprehensive network of providers, complemented by Health Net's organization, which includes dedicated associates who are knowledgeable about, and experienced in, meeting both Medicare and Medi-Cal access and network adequacy needs. Health Net has established access to care policies and standards for health care services, including requirements that providers offer office hours at least equal to those offered to other lines of business and provide medically necessary services 24/7/365. Access standards









include primary and specialty care appointment access, after-hours access and instruction, and telephone customer service and triage or screening service access. Additionally, Health Net has standards for availability of practitioners, providers, and health care facilities including distance to care and ratios of providers to members. Health Net regularly surveys members and providers to evaluate access to care and reviews this information alongside member grievances to assess overall satisfaction. Health Net is currently in compliance with DHCS standards and Department of Managed Health Care (DMHC) Timely Access regulations and meets access standards for CMS and NCQA with an accreditation rating of Excellent for Medicare and Commendable for Medi-Cal.

Question 5.2.3 Describe how you communicate information about the accessibility levels of providers in your network to beneficiaries.

Access standards, the availability of triage and screening services and the Nurse Advice Line and how to obtain these services is disclosed annually to Health Net's members via the EOC or member newsletters. Health Net identifies which providers have been assessed and evaluated as meeting access requirements for disabled members in the hard copy and online provider directory. Health Net's website also provides Demonstration information. Members who call the Member Services Center receive information on the providers in the network and









are offered assistance with making appointments or provided with assistance on securing out-of-area services.

Section 5.3 Education and Outreach

Question 5.3.1 Describe how you will ensure effective communication in a range of formats with beneficiaries.

Health Net provides alternative format materials consisting of: large print, Braille, Analog and Digital audio, computer disk digital audio (CDDA), and Accessible PDF. New technology has made it possible to overlay Braille translations on large font documents to assure that vision impaired members can receive support from their family and providers as well as understand their materials directly. Accessible PDFs contain voice recognition programming so that member devices such as iPads and smart phones can read the document aloud to the member. Health Net has contracted a consultant company to advise us on new and developing technologies to improve communication with disabled populations. In addition, Health Net's Cultural and Linguistic (C&L) Services department incorporates ADA-compliant guidelines into the contracting for, and provision of, language services and member communications. The C&L Services department provides in-service training to departments that routinely send member communications, such as Appeals and Grievance and Member Services Centers, to keep them informed of ADA-compliant communication guidelines.









Health Net routinely promotes the use of sign language services to contracted providers. Contracted providers are encouraged to use a qualified sign language interpreter for all informed consent and discouraged from using minors, family, or friends as interpreters. Health Net arranges and pays for sign language interpreters at the member or physician request for all Dual Eligible beneficiaries. Health Net has a network of sign language vendors for LA County to assure all Dual Eligible beneficiaries will have access to in-person interpreter support.

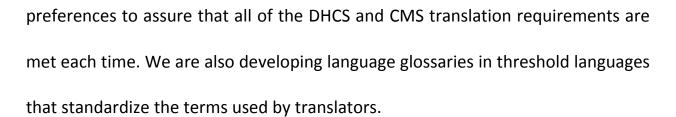
Explain how your organization currently meets the linguistic Question 5.3.2 and cultural needs to communicate with consumers/beneficiaries in their own language, and any pending improvements in that capability.

Health Net has over 14 years of experience in producing quality translations, including alternate formats. Health Net translates member informing materials, member outreach materials, and our website content. Health Net has a thorough and comprehensive translation process that includes quality standards for translations, quality standards for translators, a translation and alternate format style guides to promote consistent translation quality, and a glossary of common terms in threshold languages. English documents are examined to guarantee that all phrases and concepts can be clearly translated and a quality monitoring process ensures vendors meet the quality standards established by Health Net. We have developed a style guide for use by translators that details our translation









Health Net translates a wide range of member informing materials including: Member EOCs, applications, disclosure forms, provider directories, marketing materials, letters (e.g., emergency room follow-up), Health Net-generated preventive health reminders, member surveys, and Member Newsletters. To assure that all members are aware that they can request translated materials, Health Net promotes translation services and interpreter assistance in the member newsletters and the EOC.

The C&L Services department produces member informing materials that are culturally and linguistically appropriate. The development and translation of health education materials is guided by policies approved by the Quality Improvement Committee. Health Net has adopted plain language guidelines. This initiative addresses the issue of low health literacy that disproportionately impacts populations such as those enrolled in Medi-Cal. The C&L Services department oversees the translation process and is staffed with personnel trained in linguistics who are experienced in exploring and evaluating new technologies to provide language services. All translated member informing material is tracked.









When members call our Member Services Center, the multi-lingual Member Service Center representatives are able to quickly locate a specific document through the document numbering system and provide an oral translation or send out the translated document to the member. Health Net recently received NCQA's Muticultural Health Care Distinction award for our Medi-Cal line of business. NCQA's distinction recognizes Health Net's Medi-Cal program as delivering quality multicultural health care, addressing health care disparities and providing culturally and linguistically appropriate services. Health Net has implemented processes to assure that we will maintain this distinction.

Certify that you will comply with rigorous requirements Question 5.3.3 established by DHCS and provide the following as part of the Readiness Review: - A detailed operational plan for beneficiary outreach and communication. - An explanation of the different modes of communication for beneficiaries' visual, audio, and linguistic needs. - An explanation of your approach to educate counselors and providers to explain the benefit package to beneficiaries in a way they can understand.

Health Net certifies it will comply with the above referenced DHCS requirements in Question 5.3.3. Figure 5 provides an outline of Health Net's operational outreach and communication plan for beneficiaries, providers and counselors.









Figure 5. Health Net's Operational Outreach and Communication Plan Outline

| Communication | Distribution Method/Frequency | Details of Contents | Additional Formats |
|---|--|--|---|
| Enrollment Kit | Upon beneficiary request or distributed via enrollment meetings or educational events. | Introduction LetterPlan OverviewSummary of BenefitsHow to EnrollEnrollment Forms | Threshold languages Large print Braille Audio CD Accessible PDF |
| Network Directories | Sent upon enrollment and annually thereafter. Provided to beneficiaries for reference in enrollment meetings, or upon request. | Directories specific to the plan county updated twice annually if required Clarification on providers that speak secondary languages Physical accessibility information for provider offices | Threshold languagesLarge printBrailleAudio CDWebsite |
| Educational Materials (Counselors and Provider) | Available for training of counselors and providers around plan. | Brochures, flyers, leave-behinds and/or training materials DVD training that outlines the plan structure, method of enrollment, benefit outline and claims process | N/A |









| Communication | Distribution Method/Frequency | Details of Contents | Additional Formats |
|--|---|---|---|
| Educational and Wellness Mailings | Disease Management to high risk members | Living Tobacco Free Toolkit Weight Loss Toolkit Medication adherence, diabetes Control, heart health, breast and cervical cancer screenings | Threshold languages |
| Dedicated Member Services Center | Inbound calls | Member Services Center with dedicated representatives for inbound calls from beneficiaries/member s | Bilingual staff in six languages, telephone interpreter in over 100 languages |

Section 5.4 Stakeholder Input

Question 5.4.1 Discuss the local stakeholder engagement plan and timeline during 2012 project development/implementation phase, including any stakeholder meetings that have been held during development of the Application.

In collaboration with LA Care, Health Net is hosting local stakeholder meetings that include providers, community programs, consumers, and other stakeholders interested in the development, implementation, and continued operation of the pilot project. Through these meetings we have gained critical insight into the current health care delivery system in LA County, identifying areas of the system that are working well and areas of the system that need improvement. Pacific Health Consulting Group facilitated five calls in February, as outlined in Figure 6.









Figure 6. Local Stakeholder Engagement Activities February 2012

| Date | Stakeholders Represented | Topic Discussed |
|-------------|---|---|
| February 10 | INHELP, The LA Gay and Lesbian Center, Neighborhood Legal Services, MCH Access, and The Legal Aid Foundation | LA Care and Health Net presented an overview of the proposal and our collaborative work Continuity of care, case management and care coordination Other stakeholder groups to be included in outreach presentations Topics for future implementation discussions |
| February 14 | All 7 Independent Living Centers (ILCs) in LA County | LA Care and Health Net presented an overview of the proposal and our collaborative work Integration of wellness programs Early member identification to coordinate with ILCs to facilitate effective transition from acute care to home |
| February 17 | MSSP programs – AltaMed, Human Services Association, Huntington Hospital Senior Care Network, Jewish Family Service, Partners in Care, SCAN | Opportunities for collaboration Opportunities for improving care Commitment to developing expanded services |







| Date | Stakeholders Represented | Topic Discussed |
|-------------|---|--|
| February 17 | Safety net, behavioral health and other provider stakeholders | Presentation on the Demonstration in LA County Feedback to Health Net and LA Care on current challenges Future opportunities to improve access to care |
| February 21 | NLSLA, CHC, Inc., Legal Aid of Los Angeles, NCH Access, LA Gay and Lesbian Center, Armenian Relief Society, Health Care Rights, | Presentation on the Demonstration in LA County Development of an ongoing stakeholder input process |

Health Net has long-term relationships with C4A, CAADS, and the California Association of Independent Living Centers and has partnered with all three organizations to promote common goals. Representatives from Health Net sit on many of their local and statewide advisory groups. Since LA County represents such a large portion of the state's Dual Eligible beneficiaries, we have consulted with these statewide organizations to gain critical insight in the development of our Demonstration proposal and anticipate that we will continue to do so throughout the implementation period.

On February 23, Health Net convened its first focus group facilitated by the Harris Family Center for Disability Health Policy. The Harris Center is convening focus group meetings throughout February and early March with the following advocacy organizations: Disability Advocates of California, Alzheimer's Association









Los Angeles Office, Vision Y Compromiso, Communities Actively Living Independent & Free, Fiesta Educativa Incorporated, San Gabriel/Pomona Regional Center, TASK-Team of Advocates for Special Kids, Westside Center for Independent Living, The Arc Los Angeles and Orange Counties, Junior Blind of America, Rancho Los Amigos National Rehabilitation Center, Center for Health Care Rights, National Multiple Sclerosis Society, Southern California Chapter, and Partners in Care Foundation.

Feedback from all of these meetings will direct Health Net and LA Care's collaborative, ongoing implementation stakeholder meetings. We anticipate holding monthly stakeholder meetings throughout the implementation phase of the Demonstration.

Discuss the stakeholder engagement plan throughout the Question 5.4.2 three-year Demonstration.

Health Net and LA Care will continue to hold regular stakeholder meetings to guide the development of standing stakeholder advisory groups in Years 2 and 3 of the Demonstration with representation from the eight Service Planning Areas (SPAs) in LA County. The purpose of these meetings will be to gather and incorporate ongoing feedback from stakeholders on program operations, benefits, access to services, adequacy of grievance processes, and other consumer protections. These meetings will complement the LA Care Duals









Advisory Committee and the Health Net Duals Advisory Committee meetings and are intended as a forum to gather feedback from stakeholders who are not formally on the Duals Advisory Committee, as well as members and caregivers who may not be able to commit to a two-year term on a standing advisory committee. Summaries from the meetings will be posted on Health Net's dedicated Dual Eligible website, and members and other stakeholders will be invited to provide feedback through this website as well. Health Net seeks to obtain feedback from members and stakeholders through as many avenues as possible, paying special attention to members and caregivers who prefer providing feedback through alternative methods or who need assistance providing feedback.

Question 5.4.3 Identify and describe the method for meaningfully involving external stakeholders in the development and ongoing operations of the program. Meaningfully means that integrating entities, at a minimum, should develop a process for gathering and incorporating ongoing feedback from external stakeholders on program operations, benefits, access to services, adequacy of grievance processes, and other consumer protections.

Health Net and LA Care value all of the information received from stakeholders and members, and we are committed to incorporating their feedback to improve ongoing program operations, enhance benefits, ensure access to services, and maintain a grievance process that ensures consumer protections. All stakeholders' input will be presented to the relevant Health Net standing









operations department meetings to identify areas for improvement and implement needed changes. This feedback will also be presented to Health Net's LA Duals Advisory Committee. To ensure that stakeholders remain engaged in Health Net and LA Care's collaborative stakeholder involvement process, Health Net will develop a stakeholder feedback loop, including posting responses on our website, to keep stakeholders informed about actions taken and to respond to their concerns and suggestions.

Section 5.5 Enrollment Process

Question 5.5.1 Explain how you envision enrollment starting in 2013 and being phased in over the course of the year.

Health Net will support the intention of DHCS to enroll beneficiaries into the Demonstration during 2013 through a phased-in approach whereby beneficiaries are enrolled based on month of birth, or other strategy as determined by DHCS.

Describe how your organization will apply lessons learned Question 5.5.2 from the enrollment of SPDs into Medi-Cal managed care.

Our experience over the last year serving SPD members has prepared us to anticipate and plan for the needs of Dual Eligible beneficiaries. Similarly, SPD members have complex needs, are very diverse, and require creative approaches—whether it is in the way we conduct HRAs, or the way we handle their continuation of care needs, or simply the way we communicate benefit









information. Based on our lessons learned during the SPD members' transition to managed care, we will be implementing the following strategies:

- Create member welcome materials specific to Dual Eligible beneficiaries that is reflective of the cultural, linguistic, and cognitive diversity within this membership and disseminate this information in creative modalities
- Build on our dedicated team of public programs coordinators in our Member Services Center to address complex questions, including continuation of care
- Match members to the PCP and PPG that best fits their needs using available utilization, treatment authorization, or member-reported data
- Collaborate with LA Care to: develop a standard continuation of care form and distribute it widely so members and providers are not confused; develop a process for identifying and communicating with the member's legal guardian or conservator so that delays or disruptions in care are avoided; set up town hall meetings to give enrolled members an overview of the program, their benefits, the continuation of care process, and to give them an opportunity to ask questions; develop care coordination strategies around communications and referrals to LTSS, county and community based programs, and other social services.









Question 5.5.3 Describe what your organization needs to know from DHCS about administrative and network issues that will need to be addressed before the pilot programs begin enrollment.

Health Net is prepared to work closely with DHCS and CMS to make the Demonstration enrollment process successful. Health Net's enrollment process related questions are as follows:

- 1) We need DHCS to confirm that enrollment in the Demonstration will only be initiated by eligibility files received from DHCS and that Health Net will follow established CMS Medicare Advantage guidelines to submit Demonstration enrollment transactions to CMS.
- 2) What will be the file layout and frequency of the DHCS eligibility files? Will DHCS submit the Demonstration beneficiaries on the same files as the existing Medi-Cal members or will they come on separate files?
- 3) Will CMS be establishing any new transaction reply codes to support the Demonstration?
- 4) What mechanism will the health plans have to resolve any reconciliation discrepancies between CMS and DHCS?
- 5) Will the DHCS eligibility files utilize the "pending" eligibility status in the Demonstration as it does for the Medi-Cal Managed Care eligibility file process









- today? If so, Health Net needs to know how to handle the "pending" status relative to beneficiary access to benefits and communication with CMS.
- 6) Will the existing member communications listed in Chapter 2 of the CMS Medicare Managed Care Manual be the template letters Health Net should implement or will new model letters specific to the Demonstration be created by DHCS/CMS?
- 7) We need confirmation from the State on the methodology to phase in beneficiary enrollment into the Demonstration

Health Net's Enrollment and IT management teams are available to meet and discuss these questions at DHCS' earliest convenience. We welcome the opportunity to assist DHCS and CMS in resolving any administrative issues.

Section 5.6 Appeals and Grievances

Question 5.6.1 Certify that your organization will be in compliance with the appeals and grievances processes for both beneficiaries and providers described in the forthcoming Demonstration Proposal and Federal-State MOU.

Health Net certifies that we will be in compliance with the appeals and grievance process for both beneficiaries and providers described in the forthcoming Demonstration Proposal and Federal-State MOU.

Section 6. Organizational Capacity









Question 6.1 Describe the guiding principles of the organization and record of performance in delivery services to Dual Eligibles that demonstrate an understanding of the needs of the community or population.

Health Net's corporate principles of honesty, integrity, transparency, accountability, and commitment to compliance with applicable laws, regulations and company policies guide our daily work; our relationships with customers, members, and providers; and, ultimately, result in the high-quality health plan services we provide. Our understanding of the needs of the community and Dual Eligible population is described in **Section 1**.

These guiding principles are evident in our long-standing and demonstrated success serving both the California Medicare and Medi-Cal populations. Health Net has successfully maintained continuous Medicare Advantage operations for over 17 years and Medi-Cal operations for the last 27 years. We have also successfully operated D-SNP programs for the past six years. We recognize and understand the unique challenges and needs faced by Dual Eligible beneficiaries such as greater incidences of chronic disease or co-morbid mental illnesses or substance use. As a result of our extensive experience, we have the knowledge, infrastructure, and competence to serve these needs.









Question 6.2 Provide a current organizational chart with names of key leaders

Health Net is committed to the success of the Demonstration and recognizes the importance of having dedicated individuals with the relevant skills and leadership abilities to effectively implement and manage this endeavor. Figure 7 provides the current organizational chart with names of key leaders within Health Net, Inc.'s Government Services business segment that oversees Health Net Community Solutions. Also included is our functional organizational structure specific to the oversight and management of the Demonstration, which is depicted in Figure 8.

Figure 7. Current Organizational Chart with Names of Key Leaders

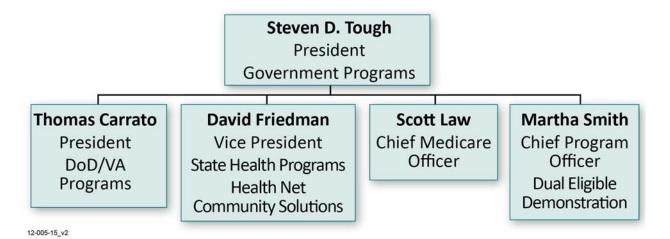


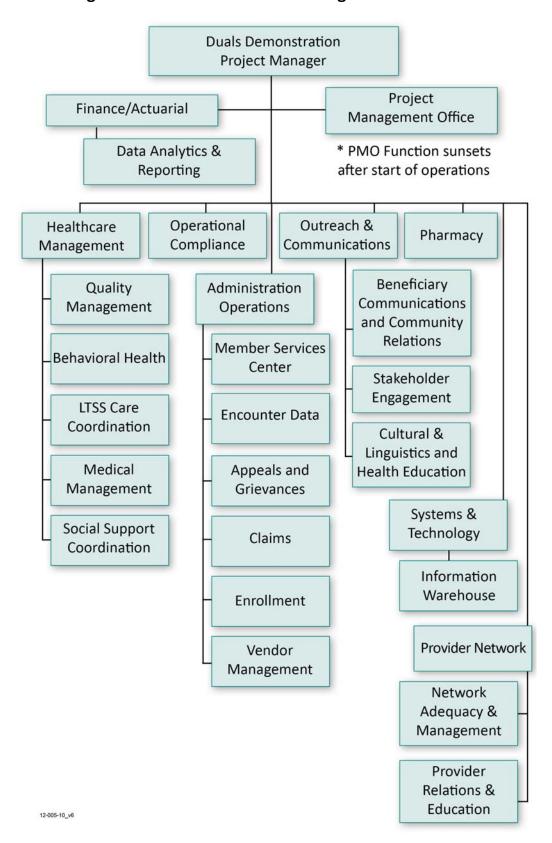








Figure 8. Health Net Functional Organizational Chart











Question 6.3 Describe how the proposed key staff members have relevant skills and leadership ability to successfully carry out the project.

In creating our team for the Demonstration, we leveraged in-place team members from our current Medicare Advantage, Medi-Cal Managed Care, and D-SNP contracts with proven leadership skills and demonstrated success to fill the key roles noted in our Demonstration organizational structure. The result is a highly experienced and seasoned team capable of delivering the right combination technical, programmatic, and experiential know-how to ensure a successful implementation and ongoing operations.

Question 6.4 Provide a resume of the Duals Demonstration Project Manager.

Ms. Martha Smith is responsible for guiding the operations and evolution of Health Net's Demonstration. A copy of Ms. Smith's resume is provided in Attachment 23.

Question 6.5 Describe the governance, organizational and structural functions that will be in place to implement, monitor, and operate the Demonstration

Demonstration Governance

Health Net recognizes the significance of this Demonstration in terms of its potential to increase the quality of care and health outcomes of California's Dual Eligible beneficiaries while lowering the overall cost of care for this population of health care service users. To realize the benefits envisioned, it will be critical to









establish a framework that governs from the highest levels of authority, incorporates consumer and stakeholder input, and effectively partners with our DHCS and CMS customers in order to effectively implement, monitor, and operate the Demonstration. Health Net envisions governance for the Demonstration on two levels. Figure 9 reflects the broader LA County Demonstration Governance Model that maintains health plan independence and beneficiary choice yet contemplates the delivery of shared services in collaboration with LA Care and LA County. Figure 10 reflects Health Net's internal Demonstration Governance Model that provides governance over Health Net's activities across the full life span of Demonstration—planning, implementation, the operations, and ongoing monitoring. Roles and responsibilities related to Health Net's internal Demonstration Governance Model are described in Figure 11. To that end, Health Net envisions a governance model with the following key attributes:

- A Demonstration Executive Management Team comprised of Health Net senior executives and key business and functional area leaders
- An external Duals Advisory Committee (responding to the RFS request for an advisory board) with the ability to influence Demonstration health plan policies and the establishment of health plan programs









• Direct interface between a proposed Government Oversight Committee, the Demonstration Executive Management Team, and our Project Management Office (PMO)









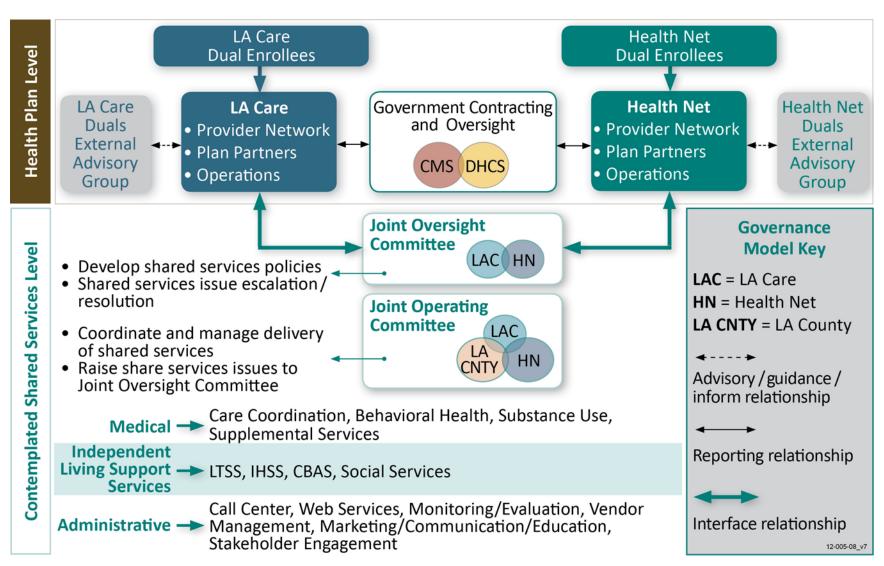










Figure 10. Health Net Demonstration Governance Model

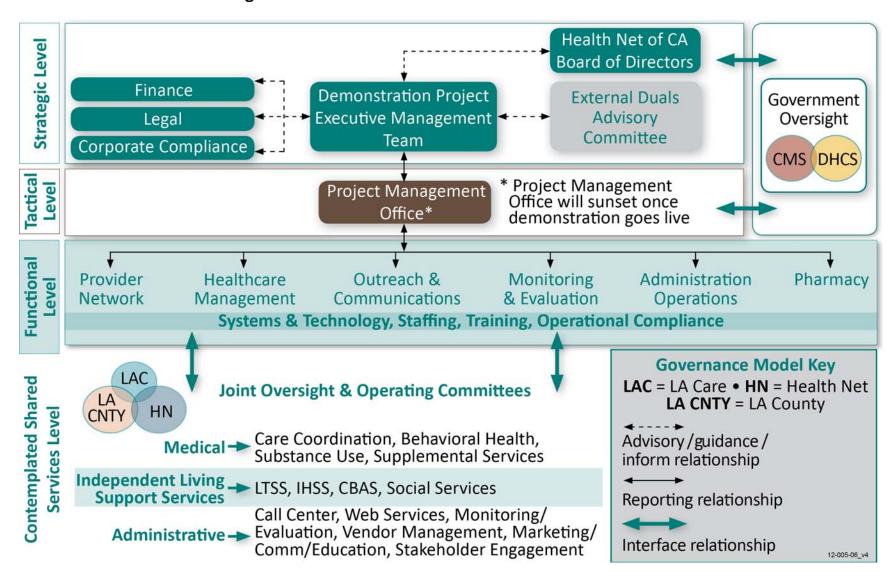










Figure 11. Health Net Demonstration Governance Model Roles and Responsibilities

| Governance Role | Responsibility | Membership | Meeting Frequency |
|-----------------------------------|--|---|----------------------|
| Executive Management Team | Overall responsibility and accountability for Demonstration success Support functional teams and business areas with removal of obstacles and barriers to success Commit business resources and staffing for the Demonstration Inform/update Health Net Strategy Execution Team and Health Net of CA Board of Directors on Program progress and performance | Steve Tough: Executive Sponsor/Co-Chair Martha Smith: Duals Demonstration Project Manager Other Executive Business Leaders | Weekly |
| External Duals Advisory Committee | Provide external input regarding beneficiary needs | Dual Eligible beneficiariesCommunity stakeholder representatives | Quarterly |









| Governance Role | Responsibility | Membership | Meeting Frequency |
|---------------------------------|--|--|--|
| Government Oversight | Provide Federal and State level oversight and monitoring of solution development, program implementation and ongoing operations of the Demonstration Support Health Net with removal of government obstacles and barriers to success Provide policy interpretation and clarification | CMS representatives DHCS representatives | Weekly during implemen tation |
| Project Management Office | Manage the implementation and project management team Report progress to the Demonstration Executive Management Team and to the CMS/DHCS Oversight Committee | Diane Sargent: Implementation ManagerPMO Team Members | Weekly |
| Functional Teams | Execute implementation and on-going operations activities Define readiness criteria and certify operational readiness Report performance to the PMO (implementation) and the Demonstration Executive Management Team (on-going operations) | Function-specific business leaders Project managers, functional team members, relevant subject matter experts and vendor representatives, if applicable | Weekly |









| Governance Role | Responsibility | Membership | Meeting Frequency |
|---------------------------|--|---|----------------------|
| Joint Oversight Committee | Develop shared services policies Provide shared services issue resolution and executive management decision making Report to both LA Care and Health Net | LA Care Executive Management representatives Health Net Executive Management representatives | Weekly |
| Joint Operating Committee | Coordinate and manage delivery of shared services Raise share services issues to Joint Oversight Committee | LA Care representativesHealth Net representativesLA County representatives | Weekly |

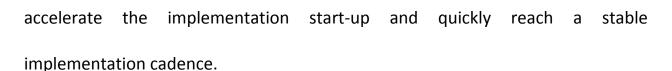
To complement our governance approach, Health Net will also seek external input and guidance from our Duals Advisory Committee, which is discussed in Section 5.1.

Implementation Management and Methodology: Health Net recognizes the importance implementation plays in establishing a solid foundation for overall Demonstration success. We have a long and successful history of managing complex implementations including our D-SNP program, the GMC and Two-Plan Medi-Cal Managed Care Model, our Federal Government TRICARE contracts, and other commercial programs. Coupled with the governance model described above, we will leverage experienced resources and existing processes and tools to









Implementation Schedule: Key to implementation success will be a comprehensive and integrated work plan that captures and appropriately sequences all of the necessary work to begin enrollment on October 15, 2012, and start operations on January 1, 2013. Our proven and time-tested implementation schedule design uses project management best practices to identify, document, and integrate all the required work. Most importantly, our schedule design enables visibility into critical internal and external dependencies, which is essential to effectively manage the complexities of such a highly integrated effort.

Implementation Reporting: Health Net is committed to providing transparent and collaborative implementation progress reporting. Our PMO will deliver formal implementation status reports to the Demonstration Executive Management Team and the Government Oversight Committee, which will include key progress metrics such as status by function, risks, issues, deliverables, and milestones. We will also incorporate any specific implementation reporting elements that may be required by DHCS and CMS.









Section 6.2 Operational Plan

Provide a preliminary operational plan that includes a draft Question 6.2.1 work plan showing how it plans to implement in 2013 and ramp up in the first year.

A draft work plan of major implementation activities is found in **Attachment 22**. This draft will serve as the basis for further implementation planning and will be the foundation to manage and monitor implementation progress. The work plan will provide DHCS and CMS, our Demonstration Executive Management Team, and each functional team with a complete, end-to-end view of all work throughout the Demonstration implementation period and into operations.

Question 6.2.2 Provide roles and responsibilities of key partners.

Health Net is proposing a comprehensive, managed care model that will deliver organized, person-centered, and cost-efficient care to Dual Eligible beneficiaries resulting in measurably improved outcomes. Critical to the delivery of this care model will be our key partners, Molina Healthcare, AltaMed, and Brand New Day. Molina Healthcare has been our long-time partner in delivering high-quality care to our Medi-Cal beneficiaries and will remain integral to our ability to deliver ongoing and expanded care throughout the Demonstration. As described in detail in **Section 2**, we are also partnering with AltaMed and Brand New Day to support the integration and coordination of LTSS and mental health services.









Question 6.2.3 Provide a timeline of major milestones and dates for successfully executing the operational plan.

Figure 12 shows a high level proposed timeline of our planned major implementation milestones. These milestones are also reflected in our Draft Implementation Schedule found in **Attachment 22** and can be identified as BLUE highlighted tasks.

Figure 12. Proposed High Level Timeline of Major Milestones

| Execution Milestone | Estimated Date(s) |
|---|---------------------------------|
| Program Mobilization | |
| Governance structure established | February 2012 |
| Detailed implementation planning completed | March 2012 |
| Implementation kick-off | April 2012 |
| Provider Network | |
| Provider network gap analysis completed | April 2012 |
| Provider network plan developed | May 2012 |
| Execute provider contracts; certify Medicare and Medi-Cal standards are met | August 2012 |
| Medical/Quality Management | |
| Quality monitoring process established | August 2012 |
| Quality metrics established and validated | October 2012 |
| Quality reporting process established | October 2012 |
| Enrollment | |
| Begin recruiting enrollment staff | June 2012 |
| Finalize and approve enrollment operating policies and procedures | August 2012 |
| Develop enrollment training program and curriculum | August 2012 |
| Deliver enrollment staff training | September 2012– October 2012 |









| Execution Milestone | Estimated Date(s) |
|--|--------------------------------|
| Enrollment systems and applications go-live | October 2012 |
| Begin receiving eligibility files from DHCS and CMS | October 2012 |
| Enrollment begins | October 2012 |
| Start mailing of ID cards, post-enrollment kits | October 2012 |
| Member Contact Center | |
| Begin recruiting member contact center staff | June 2012 |
| Finalize and approve member contact center operating policies and procedures | July 2012 |
| Develop member contact center training program and curriculum | July 2012 |
| Deliver member contact center staff training | August 2012– September 2012 |
| Establish toll free customer service number | September 2012 |
| Member Contact Center go-live | September 2012 |
| Appeals & Grievances | |
| A&G process established | July 2012 |
| Monitoring & Reporting | |
| Finalize and approve performance metrics | July 2012 |
| Information warehouse established | April 2013 |
| Performance dashboard developed | April 2013 |
| Performance reporting begins | April 2013 |
| Outreach & Communications | |
| Develop outreach and communications plan | June 2012 |
| Develop outreach and communications materials | September 2012 |
| Begin outreach and communications activities | October 2012 |
| Beneficiary Communications and Education | |
| Develop beneficiary communications and education plan | June 2012 |
| Develop beneficiary communications materials | September 2012 |
| Begin beneficiary communications | October 2012 |









| Execution Milestone | Estimated Date(s) |
|---|------------------------------|
| Provider Communications and Education | |
| Develop provider communications and education plan | June 2012 |
| Develop provider operations manual | September 2012 |
| Begin provider communications | October 2012 |
| Stakeholder Engagement | |
| Finalize stakeholder engagement plan | April 2012 |
| Establish external Duals Advisory Committee | April 2012 |
| Begin stakeholder "town hall" meetings | September 2012 |
| Shared Services (coordination with LA Care) | |
| Establish Independent living shared services policies | July 2012 |
| Contracts with LA County mental health department executed | July 2012 |
| Execute Department of Social Service MOU (Year 1) | July 2012 |
| Execute contract with PASC | January 2013 |
| Execute contract with Public Authority | July 2013 |
| Establish medical shared services policies | July 2012 |
| Execute contracts with LTSS providers | August 2012 |
| Establish partnerships with community social support services | September 2012 |
| Operational Readiness | |
| Readiness review conducted | July 2012– September 2012 |
| Start of coverage | January 2013 |

Question 6.2.4 Certify that the Applicant will report monthly on the progress made toward implementation of the timeline. These reports will be posted publicly.

Health Net is committed to providing transparent and collaborative implementation progress reporting and certifies that it will provide monthly implementation progress status reports. Based on our experience with complex









implementations such as this, it would be our recommendation that DHCS and CMS consider more frequent reporting to provide more timely insight into overall implementation progress.

Section 7. Network Adequacy

Health Net's expansive Medicare and Medi-Cal provider network in LA County includes a number of premier medical groups, practitioners, and hospitals that have unique knowledge and experience in serving Dual Eligible beneficiaries. Health Net has secured Letters of Commitment from broadly based, well-established, quality physician groups expressing their intent to participate in the Demonstration. These providers recognize that this Demonstration will include new contractual, utilization, data sharing, and oversight requirements. These organizations include the following PPGs:

- Allied Physicians of California
- AltaMed
- AppleCare Medical Group, Inc.
- Facey Medical Foundation*
- HealthCare Partners Affiliates Medical
 Group*

- Heritage Provider Network*
- Hispanic Physicians IPA
- Pacific Independent Physician
 Association
- Brand New Day









* Not in Health Net's Medi-Cal network, but expressed interest in participating in the Demonstration and will expand our Medi-Cal provider access

Additionally Health Net has secured a Letter of Commitment from Molina Healthcare indicating its interest and commitment to participate as a health plan partner for the Demonstration. Molina Healthcare, an NCQA accredited health plan, is a leader in providing quality health care for financially vulnerable individuals both through its health plan and through its own primary care clinics.

Figure 13 demonstrates the breadth of Health Net's LA County network and reflects the number of providers participating in Health Net's existing Medicare and Medi-Cal networks.

Figure 13. Provider Network Count by Line of Business – LA County

| Provider | # of Medi-Cal Network Providers | # of Medicare Network Providers | Totals* |
|--|------------------------------------|---------------------------------|---------|
| Physician Groups | 46 | 39 | 68 |
| PCP | 1849 | 2942 | 3456 |
| Specialist | 2838 | 6939 | 7454 |
| Hospital(s) | 42 | 48 | 57 |
| * Duplicate providers are not included in Totals | | | |

Question 7.1 Describe how your organization will ensure that your provider network is adequate for your specific enrollees.

Health Net has commenced an assessment of its existing Medicare and Medi-Cal networks and has built an inventory of the network throughout LA County.









Health Net is building a comprehensive view of provider interest and commitment to participate in the Demonstration to ensure broad geographic coverage in LA County and to preserve provider choice for the Dual Eligible beneficiaries. Health Net will evaluate the composition of each PPG to determine an adequate ratio of internal medicine PCPs and ensure a complete panel of specialists is available. Health Net uses an industry-leading software program to evaluate network adequacy and ensure Medicare time and distance requirements are met. Presently CMS has an access requirement that 90 percent of Medicare beneficiaries must be within the maximum time/distance access standards to providers, and the plan must have the minimum number of providers by specialty type. Health Net currently exceeds the CMS requirement of 90 percent of Medicare beneficiaries having access according to the "large metro" time and distance standards for LA County.

Health Net has a robust network development and monitoring process that the provider network team has established in conjunction with our QI, Health Care Services, Delegation Oversight, Provider Data Management, and **FSR** departments. Networks are developed based on members' cultural, linguistic, and access needs; established PCP, specialty, and hospital ratios; practice patterns; and market analysis. They are assessed through monitoring of PCP open and









closed status; monthly demographic changes; and annual network capacity review of access and availability reports, CAHPS results, and GeoAccess maps to identify gaps and develop activities to address identified gaps. Health Net employs a variety of monitoring activities to ensure our provider network is adequate for our specific enrollees. Examples of such monitoring activities include:

- PCP Monitoring: Our system tracks the number of members assigned to each
 PCP and the available capacity of each PCP, including the PCP's extenders
 (family nurse practitioner, physician assistant, and geriatric nurse practitioner)
- Member Services Call Tracking: Member calls related to access are tracked and feedback is provided to the Provider Network Management (PNM) department for follow up with the provider to address and resolve member access issues
- Quarterly Grievance Monitoring: The QI department reviews data related to provider availability and distance-to-provider, tracks and trends these issues, and reports to relevant departments so that action can be taken to address provider access/network adequacy
- Quarterly SPD Member Continuity of Care Requests: The Member Services,
 PNM, and Health Care Services departments review continuity of care requests









quarterly to identify potential gaps in the network and frequently requested traditional FFS providers who are not in our network

Annual QI and PNM Monitoring: Extensive network capacity review of access
and availability reports, CAHPS results, and GeoAccess maps are used to identify
gaps and develop activities to address identified gaps. These activities are
reported to the Health Net QIC for input by our physician leadership and
participating network physicians.

Question 7.2 Describe the methodologies you plan to use (capitation, Medicare rates, extra payments for care coordination, etc.) to pay providers.

Our experience has provided us with the opportunity to build upon our Medicare and Medi-Cal participating provider relationships and develop unique provider reimbursement methodologies and incentives. We have found innovative ways to support traditional and safety net providers to ensure their continued participation in our networks. Health Net will employ different contracting methodologies such as capitation and fee-for-service reimbursement, along with shared risk and quality incentives to reimburse our PPGs, hospitals, and ancillary providers. A shared risk program is an incentive program for designated institutional and other ancillary services in which the PPG is encouraged to coordinate and effectively manage the member's care. Health Net has a network capitation model in which PPGs and certain hospital providers are









reimbursed on a prepaid, per member per month (PMPM) basis for the delivery, management, and coordination of medical services. The capitation model has proven to be effective in supporting a PCP health home model in which the members' care is coordinated and quality care is delivered.

Health Net will ensure the most effective methodology is employed in order to align financial incentives and improve the coordination of care for Dual Eligible beneficiaries. When services are reimbursed on an FFS basis, Health Net will preserve the current method used to coordinate benefits between Medicare and Medi-Cal coverage. In other words, provider reimbursement will be calculated as the greater of original Medicare covered amount and Medi-Cal's allowed amount. Additionally, in an effort to rebalance service delivery away from the hospital and EDs as well as ensure their appropriate use, Health Net may pay a PPG an additional PMPM payment for extending evening or weekend hours, reducing ED visits by its members, reducing readmission rates, or meeting the NCQA standards for a health home. These funds would be used by the PPG on programs that improve the quality of care to members, such as an after-hours clinic to improve access, care management, or other quality management programs.









Question 7.3 Describe how your organization would encourage providers who currently do not accept Medi-Cal to participate in the Demonstration project.

Our history and experience as a Medi-Cal and Medicare plan in LA County has allowed our local PNM team to develop a strong understanding of both programs and establish robust provider networks that address the needs of our Medi-Cal and Medicare members and community providers. Health Net will encourage providers who do not accept Medi-Cal to participate in the Demonstration by offering these providers the necessary resources, training, and support to integrate Medi-Cal benefits into their existing managed care infrastructure. Health Net intends to collaborate with LA Care to coordinate certain functions with providers so that there are operational efficiencies and consistencies to reduce the administrative burden. Health Net will promote and encourage provider participation by working with key provider trade associations such as the California Association of Physician Groups and Hospital Association of Southern California to engage in discussions around the development and implementation of the Demonstration. Our local PNM team has fostered strong provider partnerships and will work collaboratively to establish relationships in a timely manner with potential new providers by engaging in early discussions and having an open dialogue about the best model for coordination of benefits and access to care.









As demonstrated by the attached Letters of Commitment, Health Net has already begun provider outreach and has obtained Letters of Commitment from a broad range of PPGs covering an expansive geography in LA County. Wellestablished, large physician group organizations, such as HealthCare Partners and Heritage Provider Network, who have not traditionally participated in Medi-Cal, have expressed a strong interest in participating in the Demonstration because of their experience in serving Dual Eligible beneficiaries under D-SNPs and the effectiveness of their robust, integrated D-SNP MOC programs. Through the D-SNP they have proven their ability to improve quality of care and contain costs.

Health Net will develop a unique network to serve the Dual Eligible population and will contract with PPGs that have a strong track record of providing innovative and high value care to Dual Eligible beneficiaries. PPGs participating in the Demonstration will need to meet participation criteria and demonstrate the following:

- Providers geographically located near Dual Eligible beneficiaries
- Linguistic and cultural competencies offered in providers' offices
- Proven track record of quality performance as demonstrated by HEDIS®, Initial Health Assessments, and low grievance rates









- Ambulatory case management, health home, and capabilities of providing team care
- Skill and experience with administering the Medicare program and the Medi-Cal program

Behavioral health practitioners who are preferred by the PPGs, but not contracted with Health Net, will be recruited in an effort to promote continuity of care and integration.

Question 7.4 Describe how you will work with providers to ensure accessibility for beneficiaries with various disabilities.

The FSR and PARS assessments are ways in which Health Net will work with providers to ensure accessibility for beneficiaries with various disabilities. As described in Section 5.2.2, the PARS tool allows Health Net to review contracted providers' sites for accessibility. FSR nurses in our QI department are responsible for conducting facility site, medical record, and PARS of providers to evaluate their effectiveness in fulfilling their required roles and responsibilities and ensure accessibility for our members. FSR nurses, as part of the QI department, work closely with the Health Education and Community Relations departments to develop training materials for providers and their staff specifically focused on improving physician accessibility. These nurses are certified FSR reviewers per









DHCS standards and provide on-site education for providers and their staff to help them meet regulatory and contractual requirements.

Health Net contracted with the Harris Family Center for Disability and the Health Professions. Their founding director, Brenda Premo, and associate director, June Kailes, provided Health Net expertise and guidance in the development of policies, procedures, provider trainings, and staff trainings for accessibility to health care for SPD members. Together with DHCS and the Harris Family Center, Health Net helped to develop the revised 2011 version of the PARS. Results of the PARS assessment are made available to the Member Services Center to assist members in selecting a PCP that can best serve their health care needs. The accessibility status will be provided in the Health Net member web portal and provider directory.

As we have implemented the SPD care model, we have identified and implemented various mechanisms to ensure accessibility for beneficiaries with disabilities. For example, Health Net has ensured access to physicians that specialize in home care visits to serve the needs of our SPD members who require home visits.









Question 7.5 Describe your plan to engage with providers and encourage them to join your care network, to the extent those providers are working with the Demonstration population and are not in the network.

Health Net's local PNM team is responsible for engaging with providers and encouraging them to join the Demonstration provider network. The PNM team will use our established provider participation standards and will negotiate, manage and implement the contracts with Demonstration providers, including PPGs, hospitals, LTC facilities, and other ancillary providers. We will carefully monitor continuity of care requests and solicit contracts, either directly or through our sub-contracted PPGs, with non-contracted providers who have historically provided a high volume of care to Dual Eligible beneficiaries. Since member demographic and utilization data for the Demonstration population is not readily available at this time, Health Net is assessing data for its existing pharmacy drug program (PDP) members that qualify for Low Income Subsidy to determine member demographic information and identify prescribing physicians. This will allow us to identify higher volume non-contracted providers that Health Net may need to pursue for participation in the Demonstration network. Also, the member demographic information will enable us to identify which areas in LA County have a dense population of Demonstration beneficiaries that may require additional provider contracting and network expansion.









Question 7.6 Describe proposed subcontract arrangements (e.g., contracted provider network, pharmacy benefits management, etc.) in support of the goal of integrated delivery.

Health Net is committed to contracting with qualified providers and health care plans (currently offering D-SNPs) that have a strong record of providing innovative and high quality care to Dual Eligible beneficiaries. Health Net's provider network consists of medical groups and IPAs that are experienced in working with high risk populations (e.g., SPD and ADHCs/CBAS members) and have a robust membercentric health home model. For example, Health Net contracts with specialized providers in our network such as Brand New Day and AltaMed that focus on individuals diagnosed with SPMI and have care level programs that provide for the integration of care with the LA County Mental Health Department and Regional Centers. Additionally, AltaMed is a contracted provider that participates in the PACE program and is well experienced in operating a comprehensive model of care that integrates Medicare and Medi-Cal benefits and maximizes the use of community supports and services to enable individuals to remain independent and in their homes. Both Brand New Day and AltaMed have submitted Letters of Commitment, demonstrating their interest in partnering with Health Net to participate in the Demonstration.









Health Net's behavioral health network consists of multi-specialty groups and practitioners in individual practice. This network includes psychiatrists, clinical psychologists, clinical social workers, Master's level therapists, and behavioral health nurse practitioners.

Health Net intends to enter into a new, unique subcontract arrangement with providers under the Demonstration. This contractual arrangement will include the various requirements needed to support the goal of the integrated delivery model. PPGs will be required to integrate Medicare and Medi-Cal benefits and implement a care management program that includes the full integration of professional, facility, and ancillary services, along with available LTC and homeand community-based services. Health Net will work towards establishing a coordinated, robust educational program for providers, and enhanced supplemental benefits for Dual Eligible beneficiaries to maximize their ability to remain in their homes and communities as long as possible.

Health Net will continue its longstanding subcontract arrangement for pharmacy benefits management and pharmacy network management, which provides integrated delivery of pharmaceutical services and a seamless care experience for enrollees. Health Net Pharmaceutical Services, a wholly owned subsidiary of Health Net, Inc., manages and oversees all aspects of pharmacy









benefit management for all Health Net health plans, and contracts with an external vendor, CVS/Caremark, for pharmacy claims processing and pharmacy network contracting services. Keys to the success of the longstanding relationship with CVS/Caremark include the integration of extensive vendor oversight activities within operational processes and the frequent exchange of operational, benefit utilization, and performance data.

Question 7.7 Certify that the goal of integrated delivery of benefits for enrolled beneficiaries will not be weakened by sub-contractual relationships of the Applicant.

Health Net certifies that the goal of integrated delivery of benefits for enrolled beneficiaries will not be weakened by sub-contractual relationships.

Question 7.8 Certify that the Plan will meet Medicare standards for medical services and prescription drugs and Medi-Cal standards for long-term care networks and during readiness review will demonstrate this network of providers is sufficient in number, mix, and geographic distribution to meet the needs of the anticipated number of enrollees in the service area.

Health Net certifies that the Plan will meet Medicare standards for medical services and prescription drugs and Medi-Cal standards for long-term care networks and during readiness review will demonstrate this network of providers is sufficient in number, mix, and geographic distribution to meet the needs of the anticipated number of enrollees in the service area.









Question 7.9 Certify that the Plan will meet all Medicare Part D requirements (e.g., benefits, network adequacy), and submit formularies and prescription drug event data.

Health Net certifies that it will meet all Medicare Part D requirements for Dual Eligible beneficiaries in LA County, and submit formulary and prescription drug event data.

Section 7.2 Technology

Describe how your organization is currently utilizing Question 7.2.1 technology in providing quality care, including efforts of providers in your network to achieve the federal "meaningful use" health information technology (HIT) standards.

Health Net uses technology to provide important and actionable information to our providers about their assigned members, their benefits, and our managed care program. This information is made available through the provider portal on Health Net's website. The website also allows access to a host of important information, such as the formulary, medical necessity criteria sets, provider operations manuals, member EOCs, provider updates about changes to the program, claims editing updates, issues of public health importance, forms needed for submitting authorizations, and other timely health care topics. Providers in our FFS networks may also submit authorizations through the online portal to avoid a wasteful paper process and facilitate communication and turnaround time for decisions. Member eligibility is posted for the providers on a









monthly basis. A critical tool of the MOC is the ability for providers to sign onto the provider portal to view the care plans for their patients. These care plans are living documents - as the case management nurses address gaps in care and other barriers, the care plan is updated and always available to the provider for reference. In the future, we anticipate the ability to post the Nurse Advice services and summaries of coaching calls, to ensure the providers can maintain a complete picture of their patient's health interactions. Another planned intervention is posting an opportunity report for the providers, to quickly assess which members are missing necessary preventive services and chronic disease monitoring tests or treatments. Currently, those reports are hand-delivered or delivered via secure email.

Members may access similar information through the website member portal. For example, our members can access the website to check whether a preferred provider is available in our network, to check the provider's physical accessibility, and also to access important health information. Monitoring tools for tracking chronic illnesses are available, as well as a host of health-related educational topics. Health Net members also have access to a wide range of online tools and information provided in partnership with WebMD. One of these offerings is a Personal Health Record (PHR) and a Health Risk Questionnaire (HRQ). When a









member completes the HRQ, the results are imported into the PHR. Additionally, a member can elect to automatically populate the PHR with claims data directly from our systems. Because we have chosen to partner with WebMD, our PHR is portable, allowing members to export and share their information via WebMD.com.

Health Net is committed to helping our providers achieve the federal "meaningful use" health information standards. To this end, we will be working with all of our providers, including safety net providers in underserved communities, to assess their readiness to transition to an electronic medical record (EMR) and ensure they have an action plan to adopt an EMR within a reasonable period of time. During this assessment we will ensure support for this transition, including grants, project management, technology support, and networking. We also are fully aware that the EMR is only the first step; to truly advance to a health home model with a focus on quality, integration, prevention and reduction in errors, the meaningful use software and modules need to be adopted as well. For our providers who currently have an EMR, our approach is to provide bonus incentives for adoption of meaningful use measures. Our intent is to collaborate with LA Care to create and fund an incentive pool to encourage adoption of meaningful use. We will particularly promote e-prescribing, tracking









of chronic disease through registries, provider-to-provider communication, problem lists, medication lists, allergy, and drug-drug interactions as the EMR enhancements most likely to reduce errors, prevent waste, and promote true integration across the spectrum of care. In addition to an incentive, we intend on collaborating with LA Care to provide technology support, educational opportunities, and project management.

Question 7.2.2 Describe how your organization intends to utilize care technology in the duals Demonstration for the beneficiaries at very high-risk of nursing home admission (such as telehealth, remote health vitals and activity monitoring, care management technologies, medication compliance monitoring, etc.)

Health Net has met with a variety of vendors who promote or provide electronic monitoring devices to allow frail, chronically ill or aged individuals to remain safely in their homes. Much of this technology is new and promising, with limited research regarding efficacy. It is our intent to strategically use technology to help this population remain independent and enhance adherence, however, we are aware of privacy concerns, and plan to avoid member distrust and confusion by judiciously introducing technology to this population, some segments of which have likely had limited electronic experience.

Currently, we have several tools at our disposal that we provide selectively, including cell phones for our members with chronic illnesses, such as diabetes,







congestive heart failure and asthma to allow connectivity to the provider and case

illness, and through interactive text messaging, assess the member's disease

manager. These phones also issue medication reminders, timely tips about their

stability and compliance with diet, salt, fluids, and medication. Abnormal

responses to the text question trigger alerts to the provider and case manager

and provide concrete guidance to the member.

In the future, we plan to add the following for Dual Eligible beneficiaries: electronic scales for monitoring daily weight for members with heart conditions, medication bottles programmed with reminder alerts and triggers to the provider and case manager if the alert is ignored, and medical alert system monitoring to connect members to ambulance and local hospital first responders for aid following a fall or other in-home acute problem. We are considering offering an in-home video-monitoring service that allows case managers to personally observe and interact via video with cognitively impaired or physically frail members who live alone but are not yet ready for custodial placement. In addition to working with vendors, we are also exploring ways to leverage existing government programs such as the federal Lifeline program, which provides a free cell phone, with a limited number of minutes per month, to Medicaid (Medi-Cal) members.









Question 7.2.3 Describe how technologies will be utilized information exchange and device protocol interoperability standards (if applicable).

Health Net demonstrates current technological capacity to receive and transmit data between DHCS and Health Net and between CMS and Health Net. We are able to transmit using the DHCS proprietary formats without difficulty. Additionally, we are currently 5150 compliant, and are conducting all our electronic transactions in this compliant format. We have demonstrated connectivity via file exchange with our disease management, Nurse Advice Line, health coaching, and complex case management vendors to ensure timely and accurate member information is available to all staff directly involved with members. We access and post member information on secure websites for use by providers and case managers. We also have the ability to provide on-line realtime data transfers, rather than waiting for scheduled weekly or monthly file transfer updates. All security and privacy measures are in place to ensure the highest protection of patient information. Through these means, we maximize the ability of case management and providers to take action on immediate issues and share data freely. We also minimize the use of paper, fax, and voice mail. This also allows case management to remain in real-time contact with the other members of the IDCT.









Section 8. Monitoring and Evaluation

Question 8.1 Describe your organization's capacity for tracking and reporting on: Enrollee satisfaction, self-reported health status, and access to care, Uniform encounter data for all covered services, including HCBS and behavioral health services (Part D requirements for reporting PDE will continue to be applied) Condition-specific quality measures, and Risk-adjusted mortality rates.

Health Net has the ability to create an Information Warehouse to customize the tracking and reporting requirements on all of our Medi-Cal and Medicare contracts.

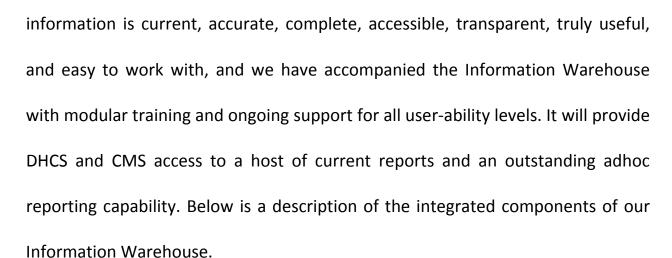
Health Net Information Warehouse: A key Health Net strength lies in our Information Warehouse, which consists of several components that together allow users to search the full scope of health care data and documentation that we collect in support of diverse federal and state government agencies. While the original data and documentation continue to reside in the native systems in which they were collected, the Information Warehouse integrates disparate data to provide users with powerful tools for locating and assembling information for multiple purposes such as performance review, analysis, and trending.

Health Net Information Warehouse for the Demonstration will be made available to DHCS and CMS via a web interface. Software will be provided for Data Warehouse queries and Health Net will provide initial training to DHCS and CMS users. Through years of refinement, our Information Warehouse ensures









- Data Warehouse containing up-to-date data and information feeds from all our transactional systems. The categories of data include: Authorizations/Referrals,
 Claims and Encounters (including pharmacy), Member Services Center, Enrollee
 Demographic, and Provider Demographic Data. Users can access the Data
 Warehouse on a 24/7/365 basis, except for periods of scheduled maintenance
 for which we typically provide a minimum of 24 hours' notice
- Data Summaries consist of regularly updated, pre-defined reports that are commonly used. For example, the Health Care Management Review provides a series of claim/encounter reports summarized by provider, diagnosis, and procedure code
- Performance Management Dashboard is a set of interfaces that provide a transparent window into our performance, measured against key contract









standards, including required metrics and approved enhancements.

Performance measures are displayed using a traffic light format

Enrollee Satisfaction: The HEDIS® Measurement and Reporting Unit (MRU) manages vendor selection and oversight for the CAHPS survey.

Self Reported Health Status: Health Net currently uses several methods to collect Self Reported Health Status for Medicare and Medi-Cal members. The Medicare Health Outcomes Survey data is collected and reported to Health Net from a contracted external vendor. The member evaluation tool/health information form questionnaire is distributed to Medi-Cal members to fill out at the time of enrollment. For SPD members, this information is used by Health Net to initiate case management outreach and risk stratification. The HRA for Medicare members is administered by our case management nurses. The HRA tool consists of 45 total questions and covers the key areas dictated by CMS to assess the member's medical, psychosocial, cognitive, and functional needs. If a member is unable to be reached or declines to complete the HRA over the phone, a hard copy is mailed to the member with return envelope. The hard copy HRA will also be included in new member packets in the near future. Results from completed HRAs are loaded into Health Net's Care Management system so the IDCT can review and update member care plan as appropriate.









Access to Care Reporting: Access to readily available health care services is critical in maintaining and improving positive health outcomes. Health Net maintains Medi-Cal and Medicare policies defining standards for both timely access to appointments and provider network availability that have been approved by DHCS and DMHC. Health Net monitors and tracks performance compared to these standards. Health Net annually uses multiple surveys and system data to track access. Network adequacy is monitored and tracked using GeoAccess software to assess distance to providers and ratio of primary care and specialist providers to members. Monitoring of the Member Services Center and tracking of telephonic access using wait times, abandonment rates, and use of the telephone triage line is conducted quarterly. Health Net reports these findings in an annual integrated access report and an annual integrated availability report. Findings are also reported to Health Net's QIC.

<u>Uniform Encounter Data:</u> Health Net will work in partnership with DHCS to provide complete claims/encounter data as specified by DHCS to support the monitoring and evaluation of the Demonstration. This includes all covered services (including HCBS, Behavioral Health, and Part D Prescription Drug Event).

<u>Condition-Specific Quality Measures:</u> Health Net has a dedicated department, the HEDIS® MRU, that is responsible for all data collection (administrative and









medical record data) and reporting. The HEDIS® MRU reports all required HEDIS® and mandated HEDIS®-like measures nationally for all lines of business including Medi-Cal, Commercial, Medicare, and CHIP (Healthy Families). For the 2011 Reporting Year, the HEDIS® MRU produced 24 HEDIS® submissions, including 17 full and 7 partial reports.

Health Net has participated in the NCQA HEDIS® Compliance Audit program since it was introduced in 1997. The HEDIS® MRU also participates in the CMS Data Validation Audit for two of the Part C measures, Procedure Frequency and Serious Reportable Adverse Events. Final audit reports submitted to NCQA and the regulatory agencies document Health Net's compliance with the audit standards and procedures and confirm our ability to produce reliable HEDIS® results. The HEDIS® MRU is also responsible for reporting the CMS Part C Procedure Frequency and Serious Reportable Events measures annually. HEDIS® measures are reported for all domains: Prevention and Screening, Respiratory, Cardiovascular and Musculoskeletal Conditions, Diabetes, Behavioral Health, Medication Management, Access/Availability of Care, and Utilization and Relative Resource Use. Measures have been reported for specific conditions or to support specific quality programs. HEDIS® reports will be stored in the Information









Warehouse Data Summary section for ease of retrieval and enhanced information dissemination.

Health Net commits to providing comprehensive financial reporting (including Medical Loss Ratio) for the Demonstration on a quarterly basis. In addition, we will work in partnership with DHCS Demonstration sites in ongoing meetings to share challenges and best practices learned throughout the Demonstration.

Question 8.2 Describe your organization's capacity for reporting beneficiary outcomes by demographic characteristics (specifically age, English proficiency, disability, ethnicity, race, gender, and sexual identity)

Member information is stored in Health Net's Information Warehouse. Member disability is analyzed based on Medi-Cal Aid Code. In addition, analyses have been completed on an annual basis to assess multiple clinical outcomes by age, language, ethnicity, race, gender, and Medi-Cal Aid Code across all Health Net's Medi-Cal counties. Health Net's QI Research and Analytics team recently analyzed our membership to identify members with asthma and diabetes by language, ethnicity, and race, as part of our NCQA submission for the Distinction in Multicultural Health Care. Member demographic information will be stored in the Information Warehouse and joined to claim/encounter data to further enhance reporting capability.









Question 8.3 Certify that you will work to meet all DHCS evaluation and monitoring requirements, once made available.

Health Net certifies we will work to meet all DHCS evaluation and monitoring requirements, once made available.

Section 9. Budget

Question 9.1 Describe any infrastructure support that could help facilitate integration of LTSS and behavioral health services (i.e. information exchange, capital investments and training to increase accessibility of network providers, technical assistance, etc).

With over 20 years of managed care experience in LA County serving both the underserved and senior populations, Health Net understands how important the seamless implementation of a new health program is for California and the Dual Eligible beneficiaries. Health Net offers several possible channels of additional financing, including federal funds, to support the Demonstration's implementation.

It is Health Net's goal to enhance the exchange of clinical information electronically with County programs. We view the development of this as supporting and enhancing both quality and efficiency. Working with mental health and LTSS providers, Health Net will partner with programs to seek out and apply for innovative technology grants.









Working with the IHSS program, Health Net will seek grant funding to explore the development of a training program for personal care workers. Health Net will host advisory group sub committees comprised of PASC, DPSS, HCBS, and ILC programs to develop a comprehensive training and certification program. This would allow professional mobility and may result in higher wages for IHSS workers. This would facilitate beneficiaries to orchestrate the delivery of their own care. Health Net will work with both CMS and DHCS to build grant funding programs.

The MSSP program is currently experiencing greater demand than capacity available to serve beneficiaries, as indicated by the wait lists for the program. Health Net will work with MSSP programs to address that current demand and develop a standardized, objective, reliable assessment process and tool going forward. Many of the services arranged by the MSSP programs will need continued grant funded support; this is especially true for housing and nutrition support programs.

Finally, many Dual Eligible beneficiaries are socially isolated despite being surrounded by family and caregivers. This social isolation has a direct negative impact on health care. Borrowing from the promotoras network model of social connection, Health Net will work with AAAs and HCBS programs to develop a pilot









model, with grant support, to address this barrier to accessing and navigating the complex health care delivery systems. The success of this program has obvious implications for improving the member's ability to gain insight into chronic disease processes and benefit from plan-offered disease management programs.

| Applicant Name | Health Net | Community | Solutions, | inc. |
|----------------|------------|-----------|------------|------|
|----------------|------------|-----------|------------|------|

(Los Angeles County)

California Dual Eligible Demonstration **Request for Solutions Proposal Checklist**

| | Mandatory Qualifications Criteria | Check box to certify YES | If no, explain |
|-------|--|--------------------------|----------------|
| 1 | Applicant has a current Knox Keene License or is a COHS and exempt. | ✓ Attachment 1 | |
| 2 | Applicant is in good financial standing with DMHC. (Attach DMHC letter) | ✓ Attachment 2 | |
| 3a | Applicant has experience operating a Medicare D-SNP in the county in which it is applying in the last three years. | ✓ Attachments 3 and 4 | |
| 3b | Applicant has not operated a D-SNP in the county in which it is applying last three years but agrees to work in good faith to meet all D-SNP requirements by 2014. | N/A | |
| 4 | Applicant has a current Medi-Cal contract with DHCS. | ✓ | |
| 5 | Applicant will work in good faith to subcontract with other plans that currently offer D-SNPs to ensure continuity of care. | ✓ | |
| 6 | Applicant will coordinate with relevant entities to ensure coverage of the entire county's population of duals. | ✓ | |
| 7a | Applicant has listed all sanctions and penalties taken by Medicare or a state of California government entity in the last five years in an attachment. | ✓ Attachment 5 | |
| 7b | Applicant is not under sanction by Centers for Medicare and Medicaid Services within California. | ✓ Attachment 5 | |
| 7c | Applicant will notify DHCS within 24 hours of any Medicare sanctions or penalties taken in California. | ✓ | |
| Signa | ture: Marking (Market) | | Page 1 |

(Los Angeles County)

| | Mandatory Qualifications Criteria | Check box to certify YES | If no, explain |
|----|--|------------------------------------|----------------|
| 8a | Applicant has listed in an attachment all DHCS-established quality performance indicators for Medi-Cal managed care plans, including but not limited to mandatory HEDIS measurements. | ✓ Attachments 6, 7, 8 and 9 | |
| 8b | Applicant has listed in an attachment all MA-SNP quality performance requirements, including but not limited to mandatory HEDIS measurements. | ✓ Attachments 6, 10, 11, 12 and 13 | |
| 9 | Applicant will work in good faith to achieve NCQA Managed Care Accreditation by the end of the third year of the Demonstration. | ✓ Attachment 14 | |
| 10 | Applicant will make every effort to provide complete and accurate encounter data as specified by DHCS to support the monitoring and evaluation of the Demonstration. | √ | |
| 11 | Applicant will fully comply with all state and federal disability accessibility and civil rights laws, including but not limited to the Americans with Disabilities Act (ADA) and the Rehabilitation Act of 1973 in all areas of service provision, including communicating information in alternate formats, shall develop a plan to encourage its contracted providers to do the same, and provide an operational approach to accomplish this as part of the Readiness Review. | ✓ Attachment 15 | |
| 12 | Applicant has provided materials (as attachments) to demonstrate meeting three of the five criteria for demonstrating local stakeholder involvement. | ✓ Attachment 16 | |

Signature:

| Applicant Name | Health Net Com | munity Solut | ions, Inc. |
|----------------|----------------|--------------|------------|
| | | | |

(Los Angeles County)

| | Mandatory Qualifications Criteria | Check box to certify YES | If no, explain |
|----|---|--------------------------|----------------|
| 13 | Applicant certifies that no person who has an ownership or a controlling interest in the Applicant's firm or is an agent or managing employee of the Applicant has been convicted of a criminal offense related to that person's involvement in any program under Medicaid (Medi-Cal), or Medicare. | ✓ | |
| 14 | If Applicant is a corporation, it is in good standing and qualified to conduct business in California. If not applicable, leave blank. | ✓ | |
| 15 | If Applicant is a limited liability company or limited partnership, it is in "active" standing and qualified to conduct business in California. If not applicable, leave blank. | N/A | |
| 16 | If Applicant is a non-profit organization, it is eligible to claim nonprofit status. If not applicable, leave blank. | N/A | |
| 17 | Applicant certifies that it has a past record of sound business integrity and a history of being responsive to past contractual obligations. | ✓ | |
| 18 | Applicant is willing to comply with future Demonstration requirements, requirements, which will be released timely by DHCS and CMS to allow for comment and implementation. Applicant will provide operational plans for achieving those requirements as part of the Readiness Review. | ✓ | |

Signature:

Sugha Manua formite Pa

(Los Angeles County)

| | Criteria for Additional Consideration | Answer | Additional explanation, if needed |
|----|---|-------------|--|
| 1a | How many years experience does the Applicant have operating a D-SNP? | 6 years | |
| 2 | Has the Plan reported receiving significant sanction or significant corrective action plans? How many? | [No] | See Attachment 5 |
| 3 | Do the Plan's three –years of HEDIS results indicate a demonstrable trend toward increasing success? | Yes | |
| 4 | Does the Plan have NCQA accreditation for its Medi-Cal managed care product? | Yes | See Attachment 14 |
| 5 | Has the Plan received NCQA certification for its D-SNP Product? | Yes | See Attachments 3 and 14 |
| 6 | How long has the Plan had a Medi-Cal contract? | 16 years | |
| 7 | Does the plan propose adding supplemental benefits? If so, which ones? | Yes | See our response in the Project Narrative, Section 1.2.1 for list of supplemental benefits. |
| 8 | Did the Plan submit letters from County officials describing their intent to work together in good faith on the Demonstration Project? From which agencies? | Yes | See Attachment 17 |
| 9 | Does the Plan have a draft agreement or contract with the County IHSS Agency? | Yes | See Attachment 18 |
| 10 | Does the Plan have a draft agreement or contract with the County agency responsible for mental health? | Yes | See Attachment 19 |
| 11 | Does the Plan express intentions to contract with provider groups that have a track record of providing innovative and high value care to dual eligibles? Which groups? | Yes | See Attachment 20 |

(Los Angeles County)

| # | Project Narrative Criteria | Check Box to certify YES | lf no, explain |
|-------|--|-----------------------------------|----------------|
| | Applicant will develop a contract with the County to administer IHSS services, through | | _ |
| 2.2.1 | individual contracts with the Public Authority | Yes | |
| | and County for IHSS administration in Year 1, | | |
| | which stipulates the criteria in the RFS. | | |
| 2 2 1 | Applicant will provide an operational plan for | Yes | |
| 2.3.1 | connecting beneficiaries to social supports that includes clear evaluation metrics. | 165 | |
| | Applicant will be in compliance with all | | |
| | consumer protections described in the | | |
| 5.1 | forthcoming Demonstration Proposal and | Yes | |
| | Federal-State MOU. Sites shall prove compliance | | |
| | during the Readiness Review. | | |
| | During the readiness review process the | | |
| 5.2.1 | Applicant will demonstrate compliance with | Yes | |
| | rigorous standards for accessibility established by DHCS. | | |
| | Applicant will comply with rigorous | _ | |
| | requirements established by DHCS and provide | ' | |
| | the following as part of the Readiness Review. | | |
| | A detailed operational plan for beneficiary | , i | |
| | outreach and communication. | | |
| 5.3.3 | An explanation of the different modes of | Yes | |
| | communication for beneficiaries' visual, | | |
| | audio, and linguistic needs. | | |
| | An explanation of your approach to educate counselors and providers to explain the | | |
| | benefit package to beneficiaries in a way they | | |
| | can understand. | | |
| | can understand. | | |

Sigh Markens Sus

(Los Angeles County)

| # | Project Narrative Criteria | Check Box to certify YES | If no, explain |
|---------------------------|--|-----------------------------------|--|
| 5.6.1 | Applicant will be in compliance with the appeals and grievances processes described in the forthcoming Demonstration Proposal and Federal-State MOU. | Yes | |
| 6.2.4 6.1.1 | Applicant will report monthly on the progress made toward implementation of the timeline. | Yes | NOTE: This Certification is in Project Narrative Section 6.2.4, not Section 6.1.1. |
| 7.7 | Applicants' sub-contractual relationships will not weaken the goal of integrated delivery of benefits for enrolled beneficiaries. | Yes | |
| 7.8 | Applicant will meet Medicare standards for medical services and prescription drugs and Medi-Cal standards for long-term care networks and during readiness review will demonstrate this network of providers is sufficient in number, mix, and geographic distribution to meet the needs of the anticipated number of enrollees in the service area. | Yes | |
| 7.9 | Applicant will meet all Medicare Part D requirements (e.g., benefits, network adequacy), and submit formularies and prescription drug event data. | Yes | |
| 8.3 | Applicant will work to meet all DHCS evaluation and monitoring requirements, once made available. | Yes | |









Table of Attachments

Attachment 1 (MQR #1). Knox-Keene License

Attachment 2 (MQR #2). DMHC Letter of Good Standing

Attachment 3 (MQR #3a). Experience Operating D-SNP

Attachment 4 (MQR #3a). Model of Care

Attachment 5 (MQR #7a). List of Sanctions

Attachment 6 (MQR #8a). High Quality

Attachment 7 (MQR #8a). HNCA LA County HEDIS Medi-Cal Report

Attachment 8 (MQR #8a). California 2010 QIP Summary Form

Attachment 9 (MQR #8a). Medi-Cal Facility Site Review/Medical Records Review

Attachment 10 (MQR #8b). 2011 HNCA HEDIS Medicare SNP Report

Attachment 11 (MQR #8b). Western Region Medicare QI Team

Mental Health Survey

Attachment 12 (MQR #8b). Medicare CAHPS 4.0 Measure

Attachment 13 (MQR #8b). HOS Metrics Contract

Attachment 14 (MQR #9). NCQA Accreditation

Attachment 15 (MQR #11). ADA Compliance Statement

Attachment 16 (MQR #12). Stakeholder Involvement

Attachment 17 (CAC #8). Letters of Support from County Officials in LA County

Attachment 18 (CAC #9). LA County IHSS (Draft amendment with signed first page of the existing Public Health MOU)

Attachment 19 (CAC #10). LA County Department of Mental Health MOU

Attachment 20 (CAC #11). Letters of Commitment

Attachment 21. CAADS and ILC CMS Innovations Grant Abstracts

Attachment 22. Health Net DRAFT Implementation Schedule









Attachment 23. Dual Eligible Demonstration Project Manager Resume, Martha Smith

STATE OF CALIFORNIA BUSINESS, TRANSPORTATION AND HOUSING AGENCY DEPARTMENT OF MANAGED HEALTH CARE

NONTRANSFERABLE AND NONASSIGNABLE

LICENSE HEALTH CARE SERVICE PLAN

File No.: 933-0426 Application No.: 2005-4207

S-05-1484

Licensee:

HEALTH NET COMMUNITY SOLUTIONS, INC.

21281 Burbank Boulevard Woodland Hills, CA 91367

IS HEREBY LICENSED AS A FULL SERVICE HEALTH PLAN PURSUANT TO THE PROVISIONS OF THE KNOX-KEENE HEALTH CARE SERVICES ACT OF 1975, AS AMENDED ("ACT"), AND IS.

AUTHORIZED TO ENGAGE IN BUSINESS AS A FULL SERVICE HEALTH CARE PLAN TO OFFER.

SERVICES TO MEDI-CAL BENEFICIARIES WITHIN THE STATE OF CALIFORNIA IN THE COUNTIES.

PREVIOUSLY APPROVED FOR MEDI-CAL OPERATIONS OF HEALTH NET OF CALIFORNIA, INC.

(FILE NO.: 933-0300), SUBJECT TO THE PROVISIONS OF THE ACT AND THE IMPLEMENTING RULES.

OF THE DIRECTOR OF THE DEPARTMENT OF MANAGED HEALTH CARE ADOPTED PURSUANT.

THERETO AND SUBJECT TO ANY CONDITIONS INCORPORATED HEREIN, AND SHALL REMAIN IN

EFFECT UNTIL SUCH TIME AS THE LICENSE IS SUSPENDED OR REVOKED BY ORDER OF THE

DIRECTOR OR IS SURRENDERED.

THE LICENSE IS ISSUED AND EFFECTIVE ON THE DATE APPEARING BELOW.

Dated: June 13, 2005 Sacramento, California

LUCINDA A. EHNES, J.D.

Director

Department of Managed Health Care

By:

WARREN BARNES
Assistant Deputy Director
Office of Legal Services

COLLEGE OF STREET

Department of Managed Health Care



Edmund G. Brown Jr., Governor State of California Health and Human Services Agency

Department of Managed Health Care 980 9th Street, Suite 500 Sacramento, CA 95814-2725 Phone: 916-445-7401 Email: reuren @ dmhc.ca.gov

February 17, 2012

VIA ELECTRONIC MAIL & U.S. MAIL

Marshall Bentley Health Net of California 2370 Kerner Blvd. San Rafael, CA 94901

Re: Letter of Standing – Health Net Community Solutions, Inc.

Dear Mr. Bentley:

On February 6, 2012, you requested a letter regarding Health Net Community Solutions, Inc.'s ("HNCS") standing as licensee under the Knox-Keene Health Care Service Plan Act. HNCS makes this request to satisfy requirements for a Request for Solutions ("RFS") issued by the California Department of Health Care Services, for the Dual Eligibles Demonstration Project.

The Department of Managed Health Care ("DMHC") confirms that, as of today's date, HNCS is licensed, and permitted to operate in the State of California, as a Knox-Keene health care service plan.

A review of the Enforcement Action Database shows that there are currently 34 enforcement actions involving HNCS. Of those, 33 involve grievance system violations; zero regard compliance with the financial requirements of the Knox-Keene Act and related regulations; and 1 was complaints regarding health care standards. The plan is not currently under supervision, a corrective action plan or special monitoring by the Office of Enforcement. The Office of Enforcement does not comment on past, pending, or anticipated Enforcement actions against any plan that might potentially impact its licensing with the State. Enforcement does not differentiate between Health Net Community Solutions, Inc. and Health Net of California, Inc. violations.

The Division of Financial Oversight ("DFO") has reviewed HNCS and HNCS is currently in compliance with the Department's financial solvency requirements, including Tangible Net Equity ("TNE") and financial viability.

¹ California Health and Safety Code Sections 1340 et seq. (the "Act"). References herein to "Section" are to Sections of the Act. References to "Rule" refer to the regulations promulgated by the Department at Title 28 California Code of Regulations.

The Division of Plan Surveys ("DPS") shows that the last Routine Medical Survey Report for HNCS was issued on May 18, 2010. All deficiencies identified during this Routine Medical Survey are corrected. The next Routine Medical Survey is due by May 17, 2013.

Please contact me with any questions or concerns.

Sincerely,

Richard Euren

Health Program Manager II, Licensing Division

Office of Health Plan Oversight

cc: Suzanne Goodwin-Stenberg, Division of Financial Oversight

Anthony Manzanetti, Division of Enforcement Marcy Gallagher, Division of Plan Surveys

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MQR #3a - Attachment 3

3.a Current Medicare Advantage Dual Eligible Special Needs Plan (D-SNP)

Health Net Community Solutions, Inc. ("Health Net") meets the requirement of operating a D-SNP in a Two-Plan Model in Los Angeles County in the last three years where it has operated a D-SNP for the last six years, through its parent, Health Net of California, Inc.'s (HNCA) contract with CMS for D-SNP enrollees.

Health Net Medicare Advantage (H0562) has administered two Dual (D-SNPs) and one Chronic or Disabling Condition (C-SNP). In 2009, the SNP Governance Committee was formed to guide implementation of the comprehensive care management and quality improvement requirements for SNPs regulated under the Medicare Improvements for Patients and Providers Act (MIPPA) of 2008. Health Net underwent an extensive process to implement team-based care for each SNP member including annual health risk assessments, stratification according to risk, assignment to a case manager and interdisciplinary care team, and member participation in the creation of an individualized care plan. The improved SNP Program went "live" in January of 2010 after months of planning and preparation. In 2011, Health Net's SNP Model of Care received the maximum 3 year approval. Attachment 4 contains the Health Net SNP Model of Care Elements and Standards, as modified by the Dual Demonstration Application. Health Net has also participated in annual evaluations of the SNP program by NCQA since first established in 2008.



SNP MODEL OF CARE

DUAL ELIGIBLE DEMONSTRATION PROJECT

2013 MODEL OF CARE
Los Angeles County

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Dual Eligible Demonstration Project

2013 SNP MODEL OF CARE DESCRIPTION

ELEMENT 1. DESCRIPTION OF THE DUAL ELIGIBLE DEMONSTRATION PROJECT-SPECIFIC TARGET POPULATION

The population targeted for Health Net's Dual Eligible Demonstration Project Special Needs Population (SNP) Model of Care consists of Dual Eligibles in Los Angeles (LA) County. Historically, this group has greater incidence of chronic disease and disproportionate utilization and health care spending of Medicare and Medicaid resources than the Medicare-only population. Epidemiological and disease characteristics of the Dual Eligible population at the county, state and national levels are described in Table 1.

The key intent of the Demonstration is to deliver a patient-centered integrated Model of Care emphasizing coordination of benefits and services that can improve outcomes and quality. An additional challenge is that almost 2 out of 5 Duals have co-morbid mental health diseases or conditions, increasing the complexity of care and coordination. In all, 43.8% of Dual Eligible beneficiaries have at least one mental/cognitive condition compared to 18.5% of all other Medicare beneficiaries. ¹ In LA County, based on 2009 -2010 claims, there are 16,829 Duals in the Short Doyle Medi-Cal System, which identifies mental health

¹ Kasper, Judy et al, "Chronic Disease and Co-Morbidity Among Dual Eligibles: Implications for Patterns of Medicaid and Medicare Service use and Spending", Kaiser Commission on Medicaid and Uninsured, July 2010

visits for beneficiaries covered under Medi-Cal. Duals with behavioral health disorders and co-morbidities are at further risk of serious complications and fragmented care.

Table 1

| Dual Eligible SNP Population Description | | | |
|--|-----------------------|----------|--|
| Los Angeles County (July/2011) | | | |
| Age/Number of Dual Eligibles, | | 381,711 | |
| | 22 to 64 years | 85,054 | |
| | Greater than 65 years | 296,657 | |
| California (July/2011) | | | |
| Age/Number of Dual Eligibles | | 1,164,40 | |
| | | 9 | |
| | 22 to 65 years | 350,635 | |
| | Greater than 65 years | 813,774 | |
| National * | | | |
| Gender | | | |
| | Female | 62% | |
| | Male | 38% | |
| Race/Ethnicity | | | |
| | White Non-Hispanic | 57% | |
| | Black Non-Hispanic | 19% | |
| | Hispanic | 15% | |
| | Other | 9% | |
| Diagram Indiana | | | |

Disease Incidence

| Dual Eligible SNP Population Description | |
|--|-----|
| Pulmonary | 28% |
| Stroke | 24% |
| Cardiovascular | 20% |
| Diabetes | 35% |
| Osteoporosis | 11% |
| Osteo or Rheumatoid Arthritis | 62% |
| Total with any Physical Condition | 85% |
| Mental/Cognitive Conditions | |
| Alzheimer's or Other Dementia | 16% |
| Depression | 23% |
| Intellectual Disabilities | 3% |
| Schizophrenia | 6% |
| Affective and Other Serious Disorders | 22% |
| Total | 44% |

^{*} SOURCE: Estimates from 2003 and 2005 MSIS and MCBS Access to Care files

EXAMPLES:

Case Studies- Details have been summarized to ensure privacy

Middle aged disabled member residing in a Board and Care for multiple years.

Mental Health diagnosis in addition to Chronic Obstructive Pulmonary Disease
(COPD), obesity, and hypertension. No family support. Member had not seen a
primary doctor for over a year. Seeing Psychiatrist regularly. Member hospitalized

twice for wound care with noncompliance. Residence at Board and Care at risk due to health problems.

The Case Manager provided assistance with establishing a new Primary Care Provider, coordinated appointments with doctors, coordinated transitions of care, transportation to appointments, home health for wound care, and in some instances had to work with the member to convince member to accept services. This involved finding alternate home health care when one service declined to see the member. After a year, the member's acute medical condition resolved and remains fairly stable in Board and Care residence.

- Example of Epidemiological Characteristics of Health Net's California SNP members: The average age of the SNP population for the six months ending June 30, 2010 was 68.99 years, which was lower than the 2009 average of 69.94 years. The SNP population was also younger than the non- SNP Medicare population by over six years. The SNP population is predominantly white (69.3%). Hispanic/Latino members constitute 34.3% of the population, followed by African American members (17.6%), Asian (11.5%), American Indian or Alaskan native (5.7%) and Hawaiian/Pacific islander (0.8%). Most have a high school education or less. Only 10.2% reported having a college education or more. A large percentage of SNP members (38.6%) live alone.
- Example of Disease Incidence among Health Net's California SNP members:
 Diabetes, hypertension, cardiovascular disorders and psychiatric disorders
 lead the list of the most prevalent diseases in the SNP population. Majority of

the top ten diseases are commonly associated with the elderly. For the most part, SNP members 65 and over comprise significantly greater portions of the disease totals, with few exceptions. Younger SNP members have more psychiatric disorder occurrences (almost 68%) than members 65 and older. Epilepsy and AIDS are likewise more likely to be found in SNP members under 65 than in those 65 and over.

ELEMENT 2. MEASURABLE GOALS

Health Net Case Management provides a patient-centric model designed to identify, acknowledge and incorporate the member's unique needs and goals into a cost effective, individualized plan. The program provides care coordination and intensive case management including decision support, member advocacy, identification and recommendation of alternative plans of care, alternative funding and community resources to support the plan of care. The Dual Eligible SNP Case Management program incorporates requirements from the National Committee for Quality Assurance (NCQA) standards, Chapt.16.b. of the Medicare Managed Care Manual and Center for Medicare and Medicaid Services (CMS) guidance documents.

2a. Specific Care Management Goals

Overall, the goal of Case Management is to support self directed care, promote self-management and help members regain optimum health or improved functional capability in the right setting and most cost effective manner.

Specifically, the goals for the Dual Eligible SNP Model of Care as stated by the CMS are to improve health outcomes through:

- Improved access to essential services such as medical, mental health, Long
 Term Supportive Services (LTSS) and social services to enable dual eligibles to
 remain in their homes and communities
- Improving access to affordable care including use of Medicare, Medi-Cal and other State/County resources
- Improved benefit coordination and timely access to care through an identified point of contact
- Improving seamless transitions of care across health care settings, providers and Home and Community Based Services (HCBS)
- Improving access to preventive health services
- Improving access to HCBS
- Assuring appropriate utilization of services
- Improved beneficiary health outcomes and satisfaction
- Preserve and enhance the ability for consumers to self-direct their care and receive high quality care

EXAMPLES:

Multiple examples of the specific metrics to measure each goal in 2a are included in Table 2 below and in Table 10 under Element 11a. The interventions taken to achieve goals are included in Table 11 under Element 11c.

2b. Measurable Outcomes and How Goals Evaluated

Measurable outcomes to identify if the above goals have been met will be collected through Healthcare Effectiveness Data and Information Set (HEDIS®), Consumer Assessment of Healthcare Providers and Systems (CAHPS), Health Risk Assessment (HRA), audit, appeals and grievance, utilization and other metrics targeting the goals in Table 2. Health Net will evaluate if the goals have been met by collecting, analyzing and reporting data annually or more often to determine if the metric specific goals have been met or exceeded. Goals will be determined through available Medicare Advantage, SNP or internal benchmarks or performance goals. Comparisons with Medicare Advantage benchmarks should be viewed with caution due to demographic differences in the populations. Results will be compared year-to-year or to Dual Eligible SNP specific benchmarks that are available.

EXAMPLES:

Table 2

MEASURABLE GOALS

Improved Access to Essential Services: Medical, Mental Health, LTSS and Social Services to enable dual eligibles to remain in their homes and communities

Member satisfaction with "Getting Needed Care" will increase by 2% in 2012

Percent of members with 1 high volume Behavioral Health Provider within 15 miles or 30 minutes from residence will meet or exceed performance goal of 90% in 2012

Percent members with Cardiologist within 15 miles or 30 minutes from residence will meet or exceed performance goal of 90% in 2012

Members utilizing transportation services will increase by 1% in 2012

Member Survey CAHPS Measures

Composite result for "Getting Needed Care"

Provider Availability Measures

Percent members with 1 High volume BHP within 15 miles or 30 mins from residence

Percent members with Cardiologist within 15 miles or 30 mins from residence

Add-On Benefits

% Members Utilizing Transportation Benefit

Improved Access to Affordable Care including use of Medicare, Medi-Cal and other State/County resources

Members with access to Providers contracted for Medicare and Medicaid will

| MEASURABLE GOALS | | |
|--|--|--|
| meet or exceed performance goal of 90% in 2012 | | |
| Percent Geo-Access Availability of Providers Contracted for | | |
| Medicare and Medicaid | | |
| PCP | | |
| Specialists | | |
| Utilization rates State/County resources | | |
| Add-On Benefits | | |
| Improved Benefit Coordination And Timely Access To Care Through An | | |
| Identified Point of Contact | | |
| Member satisfaction with help received to coordinate care will increase by 1% in | | |
| 2012 | | |
| HEDIS® measure Follow-up after Hospitalization for Mental Illness will increase | | |
| by 2% for 7 and 30 day follow-Up | | |
| Member Survey CAHPS Measures | | |
| Percent "very" or "somewhat satisfied" with help received to coordinate care | | |
| HEDIS® | | |
| Follow-up after Hospitalization for Mental Illness | | |
| 30-day Follow-up | | |
| 7-day Follow-up | | |
| Improving Seamless Transitions of Care Across Health Care Settings, Providers | | |
| and HCBS | | |
| The average number of days for non-delegated members to receive Post- | | |
| Hospital Discharge Calls will be equal to or less than 2 days in 2012 | | |

MEASURABLE GOALS

Members that have been hospitalized or in a nursing home will respond "Yes" to "Did you have the information you needed upon discharge regarding medications and follow-up care?" 85% of the time in 2012

Members with Medication Reconciliation documented post-discharge will increase by 2% in 2012

Transition of Care Measures

Average Number of Days Post- Hospital Discharge Call

% Dual Eligible SNP members that have been hospitalized or in a nursing home responding "Yes" "Did you have the information you needed upon discharge regarding medications and follow-up care?" (Yes/No)

HEDIS® Measures

Medication Reconciliation Post-Discharge

Improved Access To Preventive Health Services

Percent of members obtaining Flu Vaccine will increase by 2% in 2012

Percent of members obtaining Pneumonia Vaccine will increase by 2% in 2012

HEDIS® Measures

Members reporting Flu vaccine in past year on CAHPS survey

Members reporting Pneumonia vaccine in past year on CAHPS survey

Improving Access to HCBS

Percent of members satisfied with access to HCBS will reach performance goal of 85% in 2012

CAHPS Measure (2012 supplemental question)

Members reporting "satisfied" or "very satisfied" with access to HCBS on 2012

| MEASURABLE GOALS |
|---|
| CAHPS survey |
| Assuring Appropriate Utilization of Services |
| Case Management support will decrease inappropriate emergency room visits |
| lowering utilization by 5 ER visits per thousand members per year in 2012 |
| All Cause Readmission rate in 30 days will decrease by 1% in 2012 |
| Utilization Measures |
| Emergency Room utilization (PTMPY) |
| HEDIS® Measures |
| All Cause Readmission Hospital rate - 30 day |
| Improving Beneficiary Health Outcomes and Satisfaction |
| HEDIS® Care for Older Adult measure will improve by 5% over the 4 components |
| in 2012 |
| HEDIS® Use of High Risk Medications in the Elderly will improve 1% over the 2 |
| components in 2012. |
| HEDIS® Measures |
| Use of High Risk Medications in the Elderly (lower rate is better) |
| 1 Drug |
| 2 or More Drugs |
| HEDIS® Care for Older Adults (COA) |
| Advance Care Planning |
| Medication Review |
| Functional Status Assessment |
| Pain Screening |

MEASURABLE GOALS

Preserve And Enhance The Ability For Consumers To Self-Direct Their Care And Receive High Quality Care

HEDIS® Care for Older Adult measure will improve by 5% over the 4 components in 2012

HEDIS® Use of High Risk Medications in the Elderly will improve 1% over the 2 components in 2012.

HEDIS® Measures

Use of High Risk Medications in the Elderly (lower rate is better)

1 Drug

2 or More Drugs

HEDIS® Care for Older Adults (COA)

Advance Care Planning

Medication Review

Functional Status Assessment

Pain Screening

2c. Action Taken if Goals Not Met in Time Frame

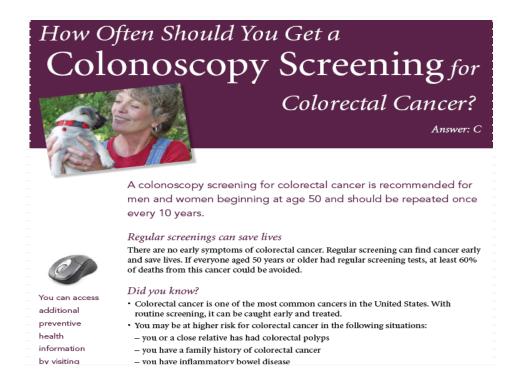
Action taken when program goals are not met will vary according to specific metrics, goals and affected departments. Health Net has established a committee structure to foster quality improvement discussions and activities from multi-disciplinary areas to ensure compliance with regulatory and accreditation requirements. One of the functions of the committee structure is to provide input

and recommendations for corrective actions and monitoring previously identified opportunities for improvement.

EXAMPLES:

- The Quality Improvement (QI) Clinical and Service Workgroup is designed to monitor and evaluate the adequacy and appropriateness of health and administrative services on a continuous and systematic basis. The Clinical QI Workgroup also supports the identification and pursuit of opportunities to improve clinical health outcomes, safety, access, services and member and provider satisfaction. The Clinical QI Workgroup consists of a small core of QI staff, a consulting physician and ad-hoc members pertinent to the report topic. At each meeting, there is focused discussion on report findings, barriers, and interventions for the purpose of making and implementing decisions regarding QI activities and actions to correct deficiencies. The Clinical QI Workgroup meets at least four times per year and reports significant findings to the Quality Improvement Committee.
- Outcomes from the HEDIS®, CAHPS, HRA, Medication Therapy Management (MTM), utilization, communication systems and other program indices are analyzed at least annually. Action taken for metrics that do not meet goals can include Quality Improvement Projects or activities such as member outreach, provider education, benefit restructuring or system and process changes designed to impact the outcomes and improve care or service. In 2011, multiple interventions to Medicare and Dual Eligible SNP members and providers in the form of reminder calls, newsletters and educational materials

were conducted after barrier analysis to improve below goal Flu/Pneumonia Vaccination, Colorectal Cancer and Glaucoma screening rates.



Health Net conducts a structured pre-delegation evaluation to include analysis of program documents, audit of related files and an on-site review of the Dual Eligible SNP delegated group's operations. The evaluation results are compiled and a written summary of findings and recommendations are presented to the Delegation Oversight Committee for final determination.

This type of audit is also performed annually to determine the continuation of the delegated relationship. Delegated groups that do not meet the Dual Eligible SNP program requirements are de-delegated. In 2011, 9 SNP groups were de-delegated. The role of delegated groups are elaborated on further in Element 5

Excerpt from Delegation Oversight Committee Report:

Interventions

- **1.** MPM gave XXMG Medical Directors and Director of XX Managed Healthcare, sample SNP P&Ps, CM initial assessment and progress notes, & HN SNP PDAT and File Review Tools.
- **2.** MPM met with and educated the XX Medical Group CM nurse regarding SNP CM documentation, and discussed the findings of the X/XX/XX SNP CM files review.
- **3.** MPM contacted the CM nurse several times and discussed ways to streamline the SNP CM processes.
- 4. MPM discussed above at the X/XX/XX HN DOW.

Next Steps/Recommendations

- 1. De-delegate for SNP CM function.
- 2. Health Net Internal meeting for transition process.
- 3. Health Net and XX Medical Group meeting for transition process.
- Health Net also investigates and requests corrective actions when timely access to care, as required by Health Net's Access and Availability policies, is not met. Health Net implements plan-level and Participating Provider Group (PPG) level corrective actions based on its accessibility assessments. Plan level results and applicable actions for improvement are communicated to the Health Net Quality Improvement Committee (HNQIC) for review and approval. In 2010, 108 provider groups were designated to complete

Corrective Action plans as a result of the after-hours survey that evaluates member access to providers for urgent issues after routine business hours.

Any group that did not achieve the 100% performance goal had to complete a Corrective Action Plan (CAP) with actions taken to become compliant.

ELEMENT 3. STAFF STRUCTURE AND CARE MANAGEMENT ROLES

The Dual Eligible SNP Governance Committee has oversight of the Dual Eligible SNP Program and reports to the Medicare Care Management Access and Clinical Quality Committee (CMACQC). Membership on the Dual Eligible SNP Governance committee will include administrative representatives from departments such as: QI, Provider Network, Medical Management, Medicare Products, Case Management, State Health Programs, Delegation Oversight, Pharmacy Services, MHN (behavioral health) Compliance and Concurrent Review. The Dual Eligible SNP Governance committee oversees the implementation of the Dual Eligible SNP Model of Care, approves policies, procedures, materials and reviews the effectiveness of the Dual Eligible SNP Model of Care and the need for additional services and benefits.

In addition to the governance committee, the administrative, clinical and oversight functions and the corresponding staff structure to implement the Dual Eligible SNP program is represented in Tables 3-6:

EXAMPLES:

3a. Administrative Functions

Table 3

| Role/Responsibilities | Personnel |
|---|--------------------------------------|
| Process enrollment | Eligibility Representatives |
| Verify eligibility for special needs plan | Eligibility Representatives |
| Annually complete Pre-Screening tool | Eligibility Representatives |
| for Dual Eligible SNP | |
| Process Claims | Claims Adjusters |
| Process and facilitate resolution of | Appeals and Grievances, Member |
| grievances and provider complaints | Service Representatives |
| Communicate plan information | Sales and Marketing, Brokers, Member |
| | Service Representatives |
| Collect, analyze, report, and act on | Quality Improvement Specialists |
| performance and health outcomes | |
| data | |
| Conduct Quality Improvement Program | Quality Improvement Specialists and |
| | Managers |
| Review and analyze utilization data | Medical Management, Quality |
| | Improvement, Research and Analysis |
| | Specialists |
| Survey members and providers | Quality Improvement, MHN |
| Report to CMS and state regulators (as | Quality Improvement, Compliance, |

| Role/Responsibilities | Personnel |
|-----------------------|---------------------|
| requested) | Product Development |

3b. Clinical Functions

Table 4

| Role/Responsibilities | Personnel |
|---|--------------------------------------|
| Coordinate care management | Case Managers, Providers |
| Advocate, inform, and educate | Case Managers, Member Service |
| beneficiaries on services and benefits | Representatives, Providers, Care |
| | Coordinators and Patient Navigators |
| Identify and facilitate access to | Case Managers, MHN Case Managers, |
| community resources | Providers, Care Coordinators and |
| | Patient Navigators |
| Triage care needs | Case Managers, MHN Case Managers, |
| | Providers |
| Facilitate Health Risk Assessment (HRA) | Case Managers, Member Service |
| | Representatives, Survey vendor, Care |
| | Coordinators and Patient Navigators |
| Evaluate and analyze responses to HRA | Data Analysis, Case Managers |
| and assign members according to risk | |
| level | |
| Facilitate implementation of Care Plan | Case Managers , MHN Case Managers, |
| | Providers |

| Role/Responsibilities | Personnel |
|--------------------------------------|--------------------------------------|
| Educate members in disease and | Case Managers, MHN Case Managers, |
| behavioral health self-management | Disease Management Licensed Health |
| | Coaches, Providers, Health Educators |
| Consult on pharmacy issues | Pharmacists |
| Authorize or facilitate access to | Providers, Pre-authorization, |
| services | Concurrent Review, Case Managers, |
| | MHN Case Managers, Care |
| | Coordinators and Patient Navigators |
| Obtain consultation and diagnostic | Case Managers, Pre-authorization, |
| reports | Concurrent review, MHN Case |
| | Managers, Providers |
| Facilitate translation services | Cultural and Linguistics, Member |
| | Service Representatives, Case |
| | Managers, MHN Case Managers, |
| | Providers |
| Facilitate transportation services | Case Managers, MHN Case Managers, |
| | Providers, Care Coordinators and |
| | Patient Navigators |
| Provide Medical and Mental Health | Providers for Health Net and MHN |
| Care | |
| Counsel on Substance Abuse and rehab | MHN Providers, MHN Case Managers, |
| strategies | Social Workers |

| Role/Responsibilities | Personnel | | |
|----------------------------|-------------------------------------|--|--|
| Coordinate Social Services | Case Managers, MHN Case Managers, | | |
| | Social Workers, Providers, Care | | |
| | Coordinators and Patient Navigators | | |
| Conduct medication reviews | Pharmacists, Providers | | |

3C. Administrative and Clinical Oversight Functions Table 5

| Role/Responsibilities | Personnel | | |
|---------------------------------------|-------------------------------------|--|--|
| Monitor care management | Director Case Management, Providers | | |
| implementation | | | |
| Assure licensure and competency | Director Credentialing | | |
| Assure statutory/regulatory | Director Compliance | | |
| compliance | | | |
| Monitor contractual services | Director Provider Network | | |
| Review pharmacy claims for | Director Pharmacy Services | | |
| appropriateness | | | |
| Maintenance and sharing of healthcare | Director Case Management, Providers | | |
| records | | | |
| Assure HIPAA Compliance | Privacy Official, All | | |
| Maintenance of paper based and/or | Director Information Management | | |
| electronic information systems | | | |

| Role/Responsibilities | Personnel | | |
|---|---------------------------------------|--|--|
| Evaluate effectiveness of Model of Care | Director/ Manager Quality | | |
| | Improvement | | |
| Implement and comply with required | Director Claims, VP Claims Operations | | |
| claims procedures for Dual Eligible SNP | | | |
| Ensure compliance QI program for the | VP Quality Improvement Program | | |
| Dual Eligible SNP Model of Care | | | |
| Compliance with HEDIS®, CAHPS, HOS | VP HEDIS® Management | | |
| requirements | | | |
| Compliance with network adequacy | VP Medical and Network Management, | | |
| | Chief Provider Contracting Officer | | |
| Compliance with Dual Eligible SNP | VP Membership Accounting and | | |
| eligibility requirements | Eligibility | | |
| Compliance with requirements of the | VP Customer Contact Center, Chief | | |
| integrated communication systems for | Customer Services Officer | | |
| the Dual Eligible SNP program | | | |
| Ensure compliance with all CMS | VP and Chief Operating Officer, CEO | | |
| Requirements including Dual Eligible | and President | | |
| SNP | | | |

Management Oversight- Clinical Functions

Table 6

| Role/Responsibilities | Personnel | | |
|--|---|--|--|
| Monitor interdisciplinary care team | Director Case Management, Providers | | |
| Assure timely and appropriate delivery | Director Case Management, Providers | | |
| of services | | | |
| Monitor providers for use of clinical | Director Quality Improvement, | | |
| practice guidelines | Delegation Oversight | | |
| Coordinate and monitor care for | Director Health Care Services, Director | | |
| seamless transitions across settings | Dual Eligible SNP Case Management, | | |
| and providers | Providers | | |
| Implementation Dual Eligible SNP | VP Clinical Services | | |
| Model of Care | | | |
| Implementation Dual Eligible SNP | Director Clinical Pharmacy | | |
| Medication Therapy Management | | | |
| Program | | | |
| Monitor network providers compliance | Medical Directors, Director Delegation | | |
| with Dual Eligible SNP Model of Care | Oversight | | |
| Monitor compliance with Dual Eligible | Clinical Operations Officer, VP and | | |
| SNP Model of Care requirements | Chief Medical Director, Chief Medical | | |
| | Officer | | |

| Role/Responsibilities | Personnel |
|--------------------------------------|--------------------------------------|
| Ensure compliance with all CMS | Healthcare Services Officer and |
| Requirements including Dual Eligible | President Pharmacy, VP and Chief |
| SNP | Operating Officer, CEO and President |

EXAMPLES:

Job Description Responsibilities/Qualifications of Medical Director

The Medical Director works actively to implement and administer medical policies, disease and medical care management programs, integrate physician services, quality assurance, appeals and grievances, and regulatory compliance programs with medical service and delivery systems to ensure the best possible quality health care for Health Net members. Assists by providing input and recommendations to the various departments within the organization as to policies and procedures that impact the delivery of medical care. Participates actively on quality improvement committees and programs to obtain and ensure continued accreditation with regulatory agencies.

Responsibilities: Leads the effective operational management of assigned departments or functions with an emphasis on execution, outcomes, continual improvement and performance enhancement. As a representative of the Health Net Plan, assists in maintaining relationships with key employer groups, physician groups, individual physicians, managed care organizations, and state medical associations and societies. Participates in quality improvement programs to assure that members receive timely, appropriate, and accessible health care.

Provides ongoing compliance with standardized Health Net, Inc. systems, policies, programs, procedures, and workflows. Participates and supports communication, education, and maintenance of partnerships with contracted providers, provider physician groups and IPA's and may serve as the interface between Plan and providers. Responsible for recommending changes and enhancements to current managed care, prior authorization, concurrent review, case management, disability review guidelines and clinical criteria based on extensive knowledge of health care delivery systems, utilization methods, reimbursement methods and treatment protocols. May participate in business development, program development, and development of care integration models for increased care delivery efficiency and effectiveness. Participates in the administration of medical management programs to assure that network providers deliver and Plan members receive appropriate, high quality, cost effective care. Assures compliance with regulatory, accreditation, and internal requirements and audits. Articulates Plan policies and procedures to providers and organizations and works to ensure effective implementation of policies and programs. May serve as a member on quality and/or care management programs and committees as directed. Investigates selected cases reported as deviating from accepted standards and takes appropriate actions. Actively interfaces with providers (hospitals, PPG's, Independent Practice Associations (IPA's)) to improve health care outcomes, health care service utilization and costs. Analyzes member and population data to guide and manage program direction such as ensuring that members enroll in clinical programs indicated by their clinical need. Leads and/or supports resolution of member or provider grievances and appeals. Optimizes

utilization of medical resources to maximize benefits for the member while supporting Health Net Plans and Health Net corporate initiatives. Actively supports Quality and Compliance to ensure that Health Net meets and exceeds medical management, regulatory, agency, and quality standards. Provides effective and active medical management leadership. Serves on quality and care management teams and committees. Performs all other duties as assigned.

Education: Graduate of an accredited medical school; Doctorate degree in Medicine. Board certification in an American Board of Medical Specialties (ABMS) recognized specialty. Unrestricted active Medical Doctor (MD) license in the State of practicing and credentialed by the health plan of employment.

Experience: Minimum five years medical practice after completing residency-training requirements for board eligibility. Minimum three years medical management experience in a managed care environment

• Job Description Responsibilities/Qualifications of Case Managers:

The Case Manager/Care Coordinator is responsible for the coordination of services and cost effective management of health care resources to meet individual members' health care needs and promote positive health outcomes. Acts as a member advocate and a liaison between providers, members and Health Net to seamlessly integrate complex services. Case Management services are generally focused on members who fall into one or more high risk or high cost groups and require significant clinical judgment, independent analysis, critical-thinking, detailed knowledge of departmental procedures, clinical guidelines,

community resources, contracting and community standards of care. Case Management includes assessment, coordination, planning, monitoring and evaluation of multiple environments. Acts as a resource for training, policy and regulatory and accreditation interpretation.

Education: One of the following required: Registered Nurse (RN) License with Bachelor's degree; or Master's degree in related health field, such as Public Health; or Bachelor's degree with equivalent experience. Graduate of a clinical degree program preferred. Valid Registered Nurse, Clinical Psychologist, or Licensed Clinical Social Worker license. Case Management certification preferred.

Experience: Minimum three years clinical experience required. Three to five years Case Management experience required. Health Plan experience preferred.

• Job Description Responsibilities/Qualifications of Concurrent Review Nurses:

The Concurrent Review/Care Manager performs advanced and complicated case review and first level determination approvals for members receiving care in an inpatient setting determining the appropriateness and medical necessity of continuing inpatient confinement including appropriate level of care, intensity of service, length of stay and place of service. Case reviews and determinations require considerable clinical judgment, independent analysis, critical-thinking skills, detailed knowledge of departmental procedures and clinical guidelines, and interaction with Medical Directors.

Reviews may be completed on-site at the facility and/or telephonically, and may be assigned based on geography, facility, provider group, product or other designation as determined appropriate. Performs discharge planning, care coordination, and authorization activities to assure appropriate post-hospital support and care. Acts as liaison between the beneficiary and the network provider and Health Net to utilize appropriate and cost effective medical resources. Acts as a resource for training, policy

and regulatory/accreditation interpretation.

Education: Graduate of an accredited nursing program. Bachelor's degree preferred. Valid state RN license. UM/CM certification preferred.

Experience: Minimum three years acute inpatient clinical experience required. Three to five years managed care experience, including discharge planning, Case Management, Utilization Management, transplant or related experience required. Health Plan experience preferred.

• Job Description Responsibilities/Qualifications of Enrollment and Eligibility

Associates:

The eligibility associate processes and maintains eligibility information for specialized and/or large group accounts. Acts as liaison for assigned groups/members and reconciles enrollment and processing. Provides mentoring and training to less experienced representatives. Reviews and processes enrollment documents submitted by employer groups. Troubleshoots escalated

and/or complex eligibility issues for immediate resolution. Responds to all written and telephone eligibility inquiries from internal (e.g. Member Services, Sales, Underwriting, Appeals and Grievance, Compliance) and external (e.g. employer groups, members CMS, DHS) customers. Identifies membership discrepancies, eligibility issues, and group contract issues for resolution by Service Representatives. Provides and documents continuous follow-up on open issues. Tracks, reviews and manually processes submitted enrollment transactions. Reviews eligibility reports and identifies all changes to eligibility (additions, terminations, and/or contract changes) and processes all resulting transactions. Compiles data and prepares reports reflecting daily statistics on new incoming forms and pended forms for distribution within department and to management. Provides project support, new hire training and coordination of open enrollment processing as needed.

Education: High School Diploma required; Post high school course work in Business or Accounting helpful

Experience: Three to four years membership eligibility experience preferred within HMO/ Health care industry

Job Description Responsibilities/Qualifications of Appeals and Grievances
 Specialists:

The Senior Appeals and Grievance Clinical Specialist performs advanced and complicated case review of the appropriateness of medical care and service provided to members requiring considerable clinical judgment, independent

analysis, and detailed knowledge of managed health care, departmental procedures and clinical guidelines. Activities include case preparation, research and overturn determinations within established guidelines. The position identifies and communicates system issues that result in failure to provide appropriate care to members or failure to meet service expectations, and coordinates activities with quality management staff. Acts as a resource for training, policy and regulatory/accreditation interpretation.

Education: Graduate of an accredited nursing program. Bachelor's degree required. Master's degree preferred. Valid state RN license.

Experience: Minimum five years clinical experience required. Three to five years utilization management or quality management experience required. 2 years previous experience in appeals and grievance case work required.

• Job Description Responsibilities/Qualifications of Member Service Associates:

The role of the Member Service Associate is to respond to routine and escalated telephone inquiries from members, providers and employer groups to provide information and clarification on multiple products and provide customer service that eventually leads to resolution of the initial inquiry. Works to enhance relationship with Health Net business partners. Coordinates, processes, and documents PCP/PPG transfers utilizing appropriate protocols. Utilizes multiple company database programs for accessing member information. Sends out requested material such as: provider directories, mail-order pharmacy information, and travel kits. Updates members' addresses and phone numbers in

the data system. Orders member identification cards, as needed. Facilitates the filing of Appeals and Grievances through accurate and timely collection of

information.

Education: High School Diploma or equivalent

Experience: Experience with Health Net automated systems to access claims, eligibility, correspondence, and related information. Fluency in English and Spanish, Mandarin, Cantonese, Vietnamese, Korean, Cambodian or other

language related to the position as required.

ELEMENT 4. INTERDISCIPLINARY CARE TEAM

Care is coordinated for Dual Eligible SNP members through an Interdisciplinary Care Team (IDCT) to address medical, cognitive, psychosocial, and functional needs. The IDCT is responsible for overseeing, coordinating, and evaluating the care delivered to members. Each Dual Eligible SNP member is assigned to an interdisciplinary care team appropriate for the member. The IDCT is composed of primary, ancillary, and specialty care providers. The composition of the IDCT and

how it is determined is described below.

4a. Composition of the IDCT

At minimum, IDCT members include:

 Medical Expert (e.g. Primary Care Physician (PCP), Specialist, or Nurse Care/ Case Manager) The member's PCP and the Case Manager assigned to

- - 34 - -

- the member is always included on the team, the Medical Director and specialists may be included when needed for specific disease management
- Social Services Expert (e.g. Social Worker, or Community Resource Specialist) Social workers or Community Resource Specialists are included on the IDCT as Dual Eligible SNP members often have psychosocial or economic issues requiring social services intervention
- Behavioral and/or mental health specialist e.g. psychiatrist, psychologist, or drug or alcohol therapist) when indicated. Behavioral health specialists from Health Net's Behavioral Health Division, (MHN) attend the IDCT meetings upon request to assist when the member has behavioral health issues such as mental illness or substance abuse

Additional IDCT members may be included as determined by the member's individual needs according to the examples provided under each specialist:

- Pharmacist may be included when the member has medication issues such as complex medication regimes, adverse reactions and side-effects, noncompliance, care gaps or other issues requiring pharmaceutical expertise
- Restorative Health Specialist (e.g. physical, occupational, speech, or recreational therapist) may be included when the member requires restorative services to improve mobility, home safety, therapeutic exercises, ambulatory aides/equipment or treatment of musculoskeletal disorders such as arthritis, multiple sclerosis, Parkinsons, stroke, paralysis, or major joint surgery

- Nutrition Specialist (e.g. Dietician or Nutritionist) may be included for members with nutritional issues such as weight loss, obesity, or therapeutic diets requiring the assistance of a dietician such as external feedings or complex diabetic, cardiac, renal or other specialized diets
- Disease Management Specialist (e.g. Preventive Health or Health Promotion Specialist) or Health Educator (Nurse Educator) - The disease management or nurse educator may be included on the IDCT when the member has been referred to Disease Management and their input would improve care coordination by sharing the specific educational plans, goals, barriers and member's response to the program with the IDCT
- Care Coordinators and Patient Navigators are unlicensed associates who
 extend the work of the Case Manager or Social Worker assisting the
 member to access services and coordinate care under the direction of the
 Case Manager or Social Worker
- Caregiver/Family may be included (when consent is obtained from the member and/or they are the legal guardian of the member) and it is determined that participation of the caregiver/family will improve the coordination of the member's care
- Pastoral Specialist may be included when the member requests that their personal spiritual advisor be included or a community Pastoral Specialist when the member has requested and consented to their involvement

 Promotoras – may be called upon to serve as liaisons between the Latino community and health professionals, human and social service organizations and provide culturally-sensitive basic health education

EXAMPLE:

Case Study – Details have been summarized to ensure privacy

This is an example of the members of the IDCT: Health Net's Behavioral Health division, MHN, identified this case during the inpatient psychiatric admit and requested co-management assistance from the Medical Group for discharge planning and coordination of care because of the member's medical conditions. MHN also contacted the Health Net (HN)--MHN Utilization Service Team to review the inpatient psych clinical assessment available in the medical management system for discharge coordination. The member's psychiatrist was also contacted and the member. Other IDCT Members Included:

- The HN-MHN Case Manager Coordination of Behavioral Health services
- Medical Group Case Manager Coordination of Medical services and ICT
- Psychologist Provider for psychological outpatient treatment
- The MHN Behavioral Health Utilization Team Coordination of inpatient care
- The Medical and Psych MD's Treatment for inpatient services
- Inpatient Case Manager Coordination of care delivery & Transitions
- Social workers Coordination of social services/discharge planning
- Primary care physician Medical provider for outpatient services
- The home health care agency In-home care and follow up for wound healing

Activity ID: Status: Signed

Activity Date: 6/24/ Activity Time: 10:00 AM

Staff Name:

Activity Type: Review with Medical Director Activity Action: SNP - Case Consult

Activity With: Contact Type: Other

Status: Reason:

Time Spent: 00:00 Current Medicald #:

Authorization: Service:

Service Review:

Activity Contact Type: Action To: Action From:

Notes: SNP CM reviewed case with medical director Dr and she agrees with coordination of care efforts with .

CM ______, assess for med complinace on unit and therapeutic dosage levels of pscyhotropic meds, possible lab work up to confirm med adherance, address palcement, long term care and legal isseus related to safty and hx of self neglect.

Void Reason: Void Description:

Last Updated: 6/24 10:12:00 AM By: Created: 6/24/ 12:00 AM By:

4b. Beneficiary Participation

The member and/or caregivers are encouraged to participate on the IDCT. The Case Manager will encourage member participation verbally and/or in writing by informing the member of the meeting time and providing contact information when appropriate. Ad-hoc team meetings are also arranged by the Case Manager when initiated by the member or caregiver to assist with care issues or specific problems they may be experiencing such as communication with the PCP or need for additional services. The Case Manager will facilitate participation by communicating with the member prior to and after the team meeting and sharing the member's input with the team when the member does not wish or is unable to attend the IDCT.

EXAMPLES:

Case Study cont: Details have been summarized to ensure privacy.

Middle aged member was initially admitted to hospital due to deterioration of mental health condition with diagnosis of dehydration and malnutrition.

Discharge planning began early in this member's inpatient stay and included frequent communication between the acute medical, and the Psychiatric team at the facility for care transitions, MHN and Medical Group Case Managers, Outpatient Providers, the member and family to create an effective Care Plan for discharge and follow-up. Transition of care between acute medical to psych and back to medical was critical for continuity of care.

Activity ID. Status: Signed

Activity Date: 8/16/20 Activity Time: 11:29 AM

Staff Name:

Activity Type: Call Outbound - Mbr/WIC Activity Action: SNP - Case Consult

Activity With: Contact Type: Enrollee

Status: Reason:

Time Spent: 00:00 Current Medicaid #:

Authorization: Service:

Service Review:

Activity Contact Type: Activity Source:
Action To: Action From:

Notes: SNP CM spoke with mbr at tel # . Mbr reports that has seen psychiatrist and adhering to regime. Mbr reports is also seeing outpt therapist Dr. in . Mbr requested additional information on tx options for ED programs. SNP CM warm transferred mbr to service team and spoke

with CM to offer clinical hx.

Void Reason:

Void Description:

Last Updated: 8/16/20 11:32:00 AM By: Created: 8/16/20 11:32:00 AM Bv:

4c. IDCT Operation and Communication

The Case Manager determines the membership of the IDCT based on the member's medical, psychosocial, cognitive and functional needs identified through the HRA and initial assessment. Representatives for Dual Eligible SNP non-delegated members are informed of the plan of care, their involvement on the IDCT and the meeting schedule by "scheduler" (electronic medical management system) letter, e-mail or fax. Members are consulted if possible

during the development of the team. Team members are documented in the member's record. Attendance sheets and the outcomes of the team meeting are documented, retained according to the document retention policy and the Care Plan is updated as indicated to communicate the results to the team. Weekly team meetings are held for internally managed members to ensure all have an IDCT documented. Care Coordination Interdisciplinary Case Rounds are attended by a minimum of Case Managers, medical staff, social workers and behavioral health and occur at least monthly for members stratified into high risk and managed by Health Net.

The role of the Interdisciplinary Care Team is to:

- Analyze and incorporate the results of the initial and annual health risk assessment into the Care Plan
- Collaborate to develop and annually update an individualized Care Plan for each Dual Eligible SNP member
- Manage the medical, cognitive, psychosocial, and functional needs of the members
- Communicate with team members and providers of care to coordinate the member Care Plan

EXAMPLE:

Case Study cont: Details have been summarized to ensure privacy.

A safe discharge plan to an appropriate setting with adequate caregivers was the goal of the interdisciplinary team including a reduction of psychosis so patient no

longer put self at risk, appropriate medical equipment for wound healing, adequate member and caregiver education, supervision so patient could safely manage daily care and sufficient nutrition. Member and family contacts to provide education on member's condition, available resources, benefits and psychological resources were a priority. Family was very involved and desired help as much as possible and received information willingly. Follow-up was continuous with member/family and providers to evaluate status, Care Plan, and promote compliance. Ongoing care coordination with IDCT team included frequent followup by PCP, appointments to Psychiatrist and Psychologist. Member initially refused resources for socialization and health education materials related to treatment and disease management, but was later willing to have case management services. Member eventually agreed to go into an apartment where meals would be provided and would have daily contact with others.

Activity ID: Status: Signed Activity Time: 1:31 PM

Activity Date: 6/

Staff Name:

Activity Type: Call Outbound - Other

Activity With:

Status:

Time Spent: 00:00

Authorization: Service:

Service Review:

Activity Contact Type: Action To:

Activity Source: Action From: and gave RN tel # to medical unit SW Notes: SNP CM spoke with PPG RN

for do planning, mbr may be do to house, RN will assist with order for in home health serivces with SW and possbile MD in home. RN reports that mbr was assessed by oon psychiatrist Dr on 6/ psychiatrist on medcial unit spoke with AP from psych bed assessment indicates that mbr is at baseline for weight and psychosis, cooperative on medical unit, hyper verbal and appropriate for dc. Psyciatrist did not select to request involuntary petition or trasfer back to psych bed. CM called outpt psychiatrist Dr. and there is not a scheduled follow up to request appointment and support med adherace stratiges or assess for appointment. Cm left message for Dr. need of conservtorship if indicated. Mbr also has option of PHP or IOP in

Activity Action: SNP - Case Consult

Contact Type: Other

Current Medicaid #:

Reason:

Void Reason:

Void Description:

Last Updated: 6/ ... 1:39:00 PM By: 1:39:00 PM By: Created: 6/

ELEMENT 5. PROVIDER NETWORK HAVING SPECIALIZED EXPERTISE AND USE OF CLINCIAL PRACTICE GUIDELINES AND PROTOCOLS

Health Net operates as both a delegated and traditional model for managed health care delivery. In the delegated model, Health Net may delegate responsibility for activities associated with utilization management, credentialing and case management to select medical groups. Groups with the infrastructure to provide the Dual Eligible SNP Model of Care can also be contracted and responsible for the team based care requirements. Advantages to centralizing these functions within the medical group include improved communication and coordination of care for members.

Coordination of Community Based Services, IHSS and LTSS remains a responsibility of the Plan. Health Net is responsible to audit delegated medical groups to ensure that the contracted services are provided in compliance with applicable rules and regulations. Members that are not part of a group delegated for the Dual Eligible SNP Model of Care receive the team based care through Health Net.

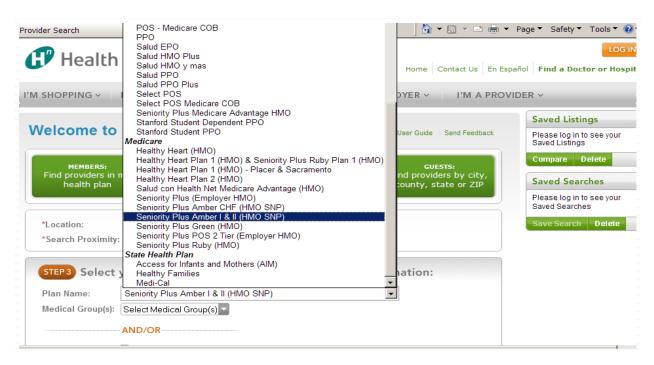
5a. Specialized Expertise

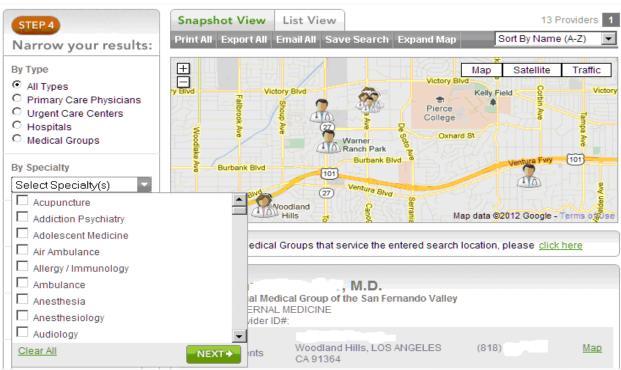
Health Net maintains a comprehensive network of Primary Care Providers, facilities, specialists, behavioral health care providers, social service providers, community agencies and ancillary services to meet the needs of Dual Eligible members with complex social and medical needs including chronic disease, such

as diabetes, cardiac, respiratory, musculoskeletal and neurological disease and behavioral health disorders. Contracts with a full range of providers and vendors, including acute care hospitals, home health care companies, infusion therapy and dialysis companies, durable medical equipment vendors, outpatient surgery facilities, radiology/imaging centers, skilled nursing facilities, acute and subacute rehabilitation facilities, mental health/chemical dependency providers, laboratory services, outpatient pharmacies, and hospices allow Dual Eligible SNP members to obtain the services they need at a convenient location. An overview is described in Table 7. Availability of providers to members is monitored regularly per the example in Table 8. The Health Net website also has a secure and user friendly search function for members to locate providers and specialists in their area.

EXAMPLES:

The screenshots below illustrates the provider search function available to members on the member portal. In addition, members can contact the Member Services Contact Center or their Case Manager for assistance locating specialists and other providers.





■ Table 7 below provides examples of key provider types and current number available in the network to *Dual Eligible SNP* members. Many of our Health Net providers who have earned Board certification in subspecialties, such as Geriatricians, but are identified based on their primary specialty. We are exploring opportunities to capture and report those subspecialties. Home and Community Based Services such as IHSS, County Mental Health services, and other Long-Term Support services will also be added to the network.

Table 7

| Health Net Provider Network for Dual | LA |
|--------------------------------------|----------|
| Eligible SNP Members | County |
| Primary Care Providers | 2,647 |
| Behavioral Health Providers (total) | , 754 |
| Psychiatrists | 296 |
| Psychologists | 358 |
| Substance Abuse Counselors | 217 |
| Specialists (total) | |
| Cardiologists | 263 |
| Neurologists | 146 |
| Ophthalmologists | 285 |
| Gastroenterologists | 178 |
| Endocrinologist | 72 |
| Facilities | |
| Hospitals | 48 |
| Behavioral Health Facilities | 26 |
| Freestanding Hospital | 10 |
| Acute/General Hospital | 12 |
| Residential Treatment Center | 2 |
| Freestanding Partial Program | 1 |
| Freestanding IOP/SOP | 1 |
| Skilled Nursing Facilities | 201 |
| Outpatient Surgical Centers | 56 |

| Health Net Provider Network for Dual | LA |
|--|---|
| Eligible SNP Members | County |
| Dialysis Centers Laboratories Pharmacies (retail) Other Pharmacies (LTC, Home Infusion) Radiology/Imaging Centers Acute Rehab Facilities Durable Medical Equipment Nursing Professionals | 138 133 1,771 308 78 8 66 |
| Nurse Case Managers Social Workers Concurrent Review Nurses Nurse Health Coaches (Disease | 18 5 29 550 |
| Allied Health Professionals Pharmacists (Health Net) Physical Therapists Occupational Therapists Speech Pathologists Radiologists | 9 332 67 71 928 |

Table 8 presents an example of the availability monitoring of facilities and providers conducted to ensure the network adequacy for Dual Eligible SNP members.

Table 8

| Availability of Network Providers 2010 CA | |
|--|-----|
| % 1 PCP within 15 miles or 30 mins from residence or workplace | 100 |
| % 1 High volume BHP within 15 miles or 30 mins from residence or workplace | 98 |
| % 1 Hospital within 15 miles or 30 mins from residence or workplace | 95 |
| % 1 ER within 15 miles or 30 mins from residence or workplace | 95 |

| Availability of Network Providers 2010 CA | |
|--|----|
| % 1 Pharmacy within 15 miles or 30 mins from residence or workplace | |
| % 2 Specialists within 15 miles or 30 mins from residence or workplace (for each high volume specialty type) | |
| Orthopedic Surg. | 97 |
| Gastroenterology | 97 |
| Cardiology | 98 |
| Neurology | 96 |
| Ophthalmology | 97 |

5b. Determination of Licensure and Competence

The Health Net Credentialing Department obtains and reviews information on credentialing or re-credentialing applications and verifies the information is in accordance with Health Net's primary source verification practices. Health Net requires groups to which credentialing has been delegated to obtain primary source information in accordance with Health Net standards of participation, state and federal regulatory requirements and accrediting entity standards.

Prior to providing health care services to Health Net members, all practitioners seeking admission to the Health Net network undergo a comprehensive review and verification of professional credentials, qualifications and other background checks. This review is conducted in accordance with Health Net standards for participation requirements, state and federal regulatory requirements and accrediting entity standards. All initial applicants are notified of the Credentialing

Committee's decision within 90 days of Health Net's receipt of a completed application.

Following initial approval into the network by the Credentialing Committee, practitioners are recredentialed within 36 months. Practitioner recredentialing includes reviewing Health Net captured performance data that provide an assessment of indicators representing professional competence and conduct. Practitioners identified in the initial or recredentialing processes with adverse actions will be investigated in accordance with *Policy/Procedure #CR140: Adverse Action*. In addition, Health Net conducts ongoing monitoring of sanctions and complaints in accordance with the guidelines established by the credentialing policy.

The credentialing process is also administered by Health Net approved delegated entities that qualify and agree to credential practitioners in accordance with Health Net's credentialing standards, state and federal regulatory requirements and accrediting entity standards. Oversight of delegated credentialing and recredentialing activities is administered under the direction of the Health Net Delegation Oversight Committee and in accordance with process described in *Policy/Procedure #CR180: IPA/Medical Group/Entity Evaluation & Delegation Determination – Credentialing.*

Health Net retains the right to approve, deny, suspend or terminate any and all practitioners participating in the Health Net network. All records, electronic or hard-copy, are maintained in accordance with Health Net corporate retention policies and procedures.

Health Net's Behavioral Health Division, MHN is responsible for the credentialing/recredentialing of the Health Net behavioral health care network. MHN credentials and recredentials practitioners in accordance with state and federal regulatory requirements and accrediting entity standards prior to providing health care services to Health Net members. Health Net credentials those behavioral health care practitioners not credentialed by MHN. Please see the Health Net Credentialing and Recredentialing Policy for complete information:

The practitioner must complete all items on a Health Net approved application and submit all requested supporting documentation. The verification time limit for a Health Net approved application is 180 days. The practitioner will answer all confidential questions and provide explanations in writing for any questions answered adversely, including but not limited to:

- Present illegal drug use
- History of loss of license or certification
- History of criminal/felony convictions
- History of loss or limitation of privileges or disciplinary actions with any health care entity
- Any inability to perform all essential functions of the contracted specialty(ies), with or without accommodation, according to criteria of professional performance
- Current malpractice insurance coverage

The practitioner will attest to the completeness and truthfulness of all elements of the application. Information submitted on the application by the practitioner must be supported by verifiable sources.

The practitioner must provide continuous work history for the previous five years. The verification time limit is 180 days. Any gaps exceeding six months will be reviewed and clarified either verbally or in writing. All verbal communication will be documented in the file. Any gap(s) in work history that exceeds one year must be clarified in writing.

The practitioner must possess a current, valid license or certificate issued by the state in which the practitioner is applying to practice. The verification time limit is 180 days. Licenses that are limited, suspended or restricted will be subject to investigation, administrative termination or denial, as outlined in policy/procedure #CR140: Adverse Action, attachment A: "Adverse Action Classification Guidelines."

The practitioner must possess adequate and appropriate education and training as stated in *attachment C: "board certification/education table."* The board certification verification time limit is 180 days; verification of medical school/residency completion is valid indefinitely.

The practitioner for whom hospital care is an essential component of their practice must possess admitting privileges with at least one Health Net participating hospital or freestanding surgery center. A documented coverage arrangement with a health net credentialed practitioner of a like specialty is a requirement in lieu of admitting privileges. Hospital privileges that have been

impacted for quality of care reasons will be acted upon as outlined in policy/procedure #CR140: Adverse Action, attachment A, "Adverse Action Classification Guidelines."

The practitioner must possess a valid, current drug enforcement administration (DEA) and/or controlled dangerous substances (CDS) certificate, if applicable. The document must be current at the time of the credentialing committee decision. Health Net verifies a DEA or CDS certificate in each state in which the practitioner is contracted to provide care to its members. If a practitioner does not have a DEA or CDS certificate, Health Net obtains an explanation that includes arrangements for the practitioner's patients who need prescriptions requiring DEA certification.

The practitioner will possess malpractice insurance coverage that meets Health Net standards. This information must be documented on the application or submitted as a face sheet. The document must be current at the time of credentialing committee decision. Exceptions may be granted for post-dated insurance coverage as indicated in the "policy statement" section of this policy. The practitioner will assist Health Net in investigating professional liability claims history for the previous five years.

The practitioner must be absent from the Medicare/Medicaid cumulative sanction report if treating members under the Medicare or a Medicaid line of business. The verification time limit is 180 days. Practitioners with identified sanctions will be investigated according to the leveling guidelines established by policy/procedure #CR-140: Adverse Action, attachment A: "Adverse Action Classification Guidelines." The practitioner must be absent from the Medicare opt-out report if treating members under the Medicare line of business. The

verification time limit is 180 days. The practitioner must be absent from the federal employee health benefits program debarment report if treating federal members. The verification time limit is 180 days.

The Health Net contracting department is responsible to determine that the facilities it contracts with are actively licensed and/or accredited. Health Net also encourages transparency by providing Health Net's Hospital Comparison Report on the member website. The Hospital Comparison Report has easy to understand details about hospital treatment outcomes, the number of patients treated for a particular illness or procedure, and the average number of days needed to treat that illness or procedure. Health Net also encourages the hospitals in its network to participate in the Leapfrog Hospital Quality and Safety Survey, a national rating system that gives consumers reliable information about a hospital's quality and safety based on computer physician order entry, intensive care physician staffing and experience with high-risk and complex medical procedures.

EXAMPLES:

 Screenshots of Health Net's website Hospital Comparison report that allows members to locate the best hospital in their area for select procedures and conditions.



 The following grid is an example of a tool the Credentialing Department uses to monitor the License/Accreditation status of facilities.

| Facilty Name | Facility Type | Prior Validation Date/License Status | Current Validation Date/License Status | Prior Accreditation Validation Date/Body/Status |
|---|---------------------------------|---|---|---|
| | | I | | 08/09/07; Accreditation |
| | Free Standing | | | Association for Ambulatory |
| 4th Street Laser & Surgery Center | Surgery Center | 8/9/07; ACTIVE | 10/22/09; ACTIVE | Healthcare; ACTIVE |
| AccentCare Home Health - Burbank | Home Health | 10/11/07; ACTIVE | 10/22/09; ACTIVE | N/A |
| AccentCare Home Health - El Centro | Home Health | N/A | 10/11/07; ACTIVE | N/A |
| AccentCare Home Health - Escondido | Home Health | N/A | 10/11/07; ACTIVE | N/A |
| AccentCare Home Health - Lancaster | Home Health | N/A | 10/11/07; ACTIVE | N/A |
| AccentCare Home Health - Sacramento | Home Health | 10/11/07; ACTIVE | 10/22/09; ACTIVE | 10/11/07; The Joint Commision; ACTIVE |
| AccentCare Home Health - San Diego | Home Health | N/A | 11/8/07; ACTIVE | N/A |
| | | | | 7/13/06; The Joint Commision; |
| Access IV | Home Infusion | 7/13/08; ACTIVE | 4/23/09; ACTIVE | ACTIVE |
| Admiral Home Health | Home Health | 4/15/04; ACTIVE | 4/12/07; ACTIVE | N/A |
| Advanced Ambulatory Surgery Center | Free Standing Surgery Center | 10/11/07; ACTIVE | 10/22/09; ACTIVE | 10/11/07; Accreditation Association for Ambulatory Healthcare; ACTIVE |
| Advanced Diagnostic and Surgical Center | Free Standing Surgery Center | 10/11/07; ACTIVE | 10/22/09; ACTIVE | 10/11/07; Accreditation Association for Ambulatory Healthcare; ACTIVE |
| Advanced Endoscopy Center | Free Standing Surgery Center | 7/14/2005: ACTIVE | 6/12/08; ACTIVE | 7/14/05; Accreditation Association for Ambulatory Healthcare; ACTIVE |
| Advanced Medical Laboratory | Laboratory | 8/19/04; ACTIVE | 8/9/07; ACTIVE | 8/19/04; Clinical Laboratory Improvement Ammendments; ACTIVE |
| Advanced Surgery Center | Free Standing Surgery Center | N/A | 6/14/07: ACTIVE | N/A |
| Agape Home Care, Inc. | Home Health | 7/14/05; ACTIVE | 7/29/08; ACTIVE | N/A |
| AGMG Endoscopy Center | Free Standing Surgery Center | 7/14/05; ACTIVE | 7/10/08; ACTIVE | 7/14/05; Accreditation Association for Ambulatory Healthcare; ACTIVE |

Report Nat'l Credentialing Org Prov

01/14/2010

5c. Determination of Services Members Receive

The member's Primary Care Provider (PCP) in conjunction with the IDCT determines which specialized medical services the member requires to meet the goals of the Care Plan. The PCP refers the member to services, specialists or providers within the network through the pre-authorization process. Services are authorized following CMS and clinical practice guidelines and the member is notified in a timely manner within set timeframes. The PCP, Member Services Representative, Case Manager and/or Social Services expert assists the member to connect to the appropriate service provider as necessary, for example specialists, medical transportation services, disease management, behavioral health, durable medical equipment, home health care, pharmacies, diabetic

supplies, podiatrists, etc. The Case Manager with the IDCT refers members to receive IHSS to continue living in their homes and communities.

EXAMPLES:

• Case study- Details have been summarized to ensure privacy

Member is a young adult with a mental health disorder and kidney disease resulting in dialysis. History of medical and social problems present as a result of noncompliance to medical advice, lack of financial support, and lack of psychiatric care. Family support not present in the immediate area. Member requires in-home support for meals, housekeeping and errands.

Health Net Social Worker was involved in case to assist with financial resources. Case Manager worked with the Medical Group and DME company to coordinate equipment and supplies. Contacted the dialysis center frequently to assess member's needs and follow up with specialists. Mental Health issues required frequent interventions and coordination with other medical providers including referrals and scheduling member with Psychiatrist fluent in member's primary language. This resulted in a decrease in the psychiatric symptoms that were interfering with treatment goals. CM arranged transportation and coordinated with PCP and PPG when member had medical complications. Health Net Social Worker is also helping the member with housing assistance.

5d. Provider Coordination with IDCT

The PCP is a member of the IDCT and works with the team and Case Manager to ensure that the member receives the specialized services they require in a timely manner. The services provided, implementation and follow-up are documented in the member's record and communicated to the members of the IDCT. Each member is assigned a Case Manager who serves as the member's primary point of contact upon enrollment. Upon identification of a member at risk, the Case Manager will contact the member or responsible party to determine if services, such as home care or DME to reduce risk of hospitalization are appropriate. The Case Manager makes referrals to other programs such as disease management, pharmacy, and behavioral health as indicated. The Case Manager follows up with the member to verify that services have been provided and to the member's satisfaction. In addition, members are informed of their rights to file appeals and grievance if services are not delivered in a timely and quality manner in their health plan materials.

Special efforts to coordinate care for members enrolled in Dual Eligible SNPs are made to maintain member in their homes and communities and especially when members move from one setting to another, such as when they are discharged from a hospital. Without coordination, such transitions can result in poor quality care and risks to patient safety. Inpatient management review by the concurrent review nurse occurs within one business day of notification of admission. Upon completion of an inpatient authorization and/or notification of concurrent admission process, an assessment for discharge planning begins. Health Net's

Care/Case Manager contacts the IDCT to assist with the completion of the assessment for appropriate discharge planning and updates to the Care Plan. The Health Net Case Manager ensures timely and sufficient communication between the IDCT team.

EXAMPLES:

Case Study: Details have been summarized to ensure privacy

This case illustrates coordination with PCP and discharge planning. Middle aged member with mental illness, diabetes and complications from continued substance abuse. History of multiple admissions, homelessness and lack of effective treatment plan. The barriers included difficulty finding appropriate residence due to behavior issues and lack of follow-up with primary doctor.

Goals set with and agreed to by the member included sobriety, address medical and mental health issues through follow up with providers and participation in behavioral health clinics. The Care Plan included discharge plan to address relapse issues.

Additional Interventions included conferences with Health Net Social Worker, hospital Social Worker, medical group outpatient Social Worker, in-patient Case Manager, MHN Case Manager, Regional Medical Director and Concurrent Review Team. Member agreed and assisted to placement in sober living facility. Case Manager facilitated change to primary doctor closer to member's current residence to improve follow-up care.

- The physician, physician office, facility or other assigned staff contact members prior to planned hospital admissions and discuss expectations, assess the member's condition and ability to follow the treatment plan, advise members of probable length of stay and help anticipate and arrange for services such as home health, durable medical equipment, transportation, etc. at discharge.
- The Care/Case Manager works collaboratively with the IDCT to identify
 fragmented care, clarify diagnosis, prognosis, therapies, daily living activities,
 obtain reports on services delivered and ensure changes are documented in
 the Care Plan
- The Care/Case Manager conducts and facilitates discharge planning upon notification of an admission to a facility. Discharge planning needs are assessed and continuity of care is facilitated through coordination between the facility, IDCT and Health Net as needed to ensure a timely and safe discharge.
- When the attending physician has determined the member no longer requires inpatient stay and authorizes discharge, the discharge and/or care transition process is communicated and a written discharge plan provided at the time of discharge that is understandable to the member and/or responsible party by the facility representative.
- When an admission is elective/planned, the Health Plan sends written notice to the member and the member's usual practitioner at the time the admission is prior authorized. The letter is issued within 5 days of the authorization. This ensures that the practitioner and member are aware of the planned transition.

- When a member transfers from inpatient setting to an outpatient setting the concurrent review nurse ensures discharge notification is communicated to the member's usual practitioner within 5 business days of discharge by issuing the "PCP Notification Letter of Discharge".
- The Case Manager conducts "Post Hospital Discharge Member Calls" within 2 days of notification of discharge home from the inpatient setting to confirm discharge plan, complete medication review and educate and screen the member for additional gaps in care that may benefit or require assistance from Case Management and communicate information with family or responsible person related to community services available to assist with ongoing care and service.

5e. Ensuring Use of Evidence Based Clinical Practice Guidelines

Clinical practice guidelines (CPGs) are developed and/or adopted to reduce variation in practice and improve the health status of members. Health Net, Inc. adopts nationally recognized, evidence-based clinical practice guidelines for medical and behavioral health conditions through the national Medical Advisory Council (MAC). Health Net Medical Directors and network practitioners are involved in the review and update process for clinical practice guidelines through MAC and Health Net Quality Improvement Committee (HNQIC). Specialty input on guidelines is obtained when indicated. Guidelines are evaluated for consistency with Health Net's benefits, utilization management criteria, and member education materials. MAC evaluates new technologies (medical and behavioral health), and devices for safety and effectiveness. The CPGs are reviewed at least

every two years or more frequently when there is new scientific evidence or new national standards are published.

Approved national medical policies and clinical practice guidelines are published and made available to the network providers through the provider portal of the Health Net web site and through provider updates. Provider groups are required to participate in the collection of HEDIS® data to monitor and ensure clinical care is consistent with evidence based clinical guidelines. In addition, the processes for appeals, grievance and potential quality issues identify deviations from accepted clinical practice and action is taken as indicated.

EXAMPLES:

Annual Provider Audit: Prior to participating with Health Net, and at least annually thereafter, the Delegation Oversight team conducts an on-site review of each delegated medical group. Health Net uses the Dual Eligible SNP addendum of the Provider Delegation Assessment Tool (PDAT), to evaluate the provider's ability to deliver high-quality health care consistently and perform the necessary functions of the Dual Eligible SNP Model of Care. In addition, Delegation Oversight periodically reviews medical group specific data including complaints, access audit performance, member satisfaction results, and quality-of-care information. A member of the regional team assigned to oversee the medical group's activities conducts the evaluation. Based on the audit scores and findings, if certain thresholds and criteria are met, the Health Net Delegation Oversight Committee (DOC) may delegate

certain specific functions to the PPG to perform. In addition, Delegation Oversight functions as a liaison between the health plan and the medical groups, providing education and support. The Delegation Oversight team reviews the following Dual Eligible SNP MOC functions during the on-site audit:

Staff Structure and Roles: group has the appropriate care management and administrative staff to coordinate needs of Duals members

Interdisciplinary Care Team and assignment

Provider Network: performance requirements, coordinating delivery of services

Policies and Procedures: all functions

Care Transitions: identifying transitions, managing transitions, reducing transitions

Model of Care training: staff training requirements, staff training strategies

Individualized Care Plan: including member participation

Case Management Systems and process

Integrated Communication Systems

Performance and Health Outcomes Measures: system to collect and analyze data to evaluate the Duals Model of Care

File review: initial assessment, individualized Care Plan, case management

 Provider Agreement - Medical groups that have the potential to meet the Model of Care requirements and interested in participating receive initial information on the goals, requirements and expectations of the Dual Eligible SNP program. If approved for delegation, an extensive provider agreement listing the details of the delegated functions and Model of Care requirements is sent to the medical group for signature. The delegation agreement includes a grid that delineates the specific responsibilities delegated to, and accepted by, the group. The Delegation Oversight team is instrumental in determining which groups are appropriate for the program. Health Net may revoke partial or complete delegation at any time if the committee determines that the group is no longer capable of performing delegated functions. The screen shot below is the section related to use of clinical practice guidelines.

| Hea | th Net ⁻ | | cipating Physician Group egated SNP Care Manage | | | |
|-----|---|---|---|--|--|---|
| es | PPG Status Delegated (Yes) or Not Delegated (No) | Delegated Participating Physician Group's (PPG) Responsibilities | Frequency of Reporting | Health Net's Responsibilities | Health Net's Process for Evaluating PPG's Performance | Corrective PPG Fails Respons |
| | ⊠ Yes □ No | PPG assures its providers deliver evidence-based services in accordance with nationally recognized clinical protocols and guidelines when available (see the Agency for Healthcare Research and Quality's National Guideline Clearinghouse at http://www.quideline.gov) | Annually: UM/SNP Program Description or P&Ps UM/SNP Workplan Semi-annually: UM/SNP Program Evaluation | Written contract with PPG stipulates that contracted providers deliver services in accordance with nationally recognized dinical protocols and guidelines when available | Review UM/SNP Workplan/reports with written evaluation provided to PPG. Initial assessment utilizing Health Net SNP Provider Delegation Assessment Tool (PDAT). Annual assessment utilizing Health Net SNP PDAT. Focused reviews | Request Correct Plan(s) element complia Potentit revocat Care Manag delegat objectiv achieve Continu noncon may less treach |

ELEMENT 6. MODEL OF CARE TRAINING

6a. Initial and Annual MOC Training

The goal of Health Net's training and education program is to equip employees with the knowledge they require to excel in their designated roles. Health Net maintains a sophisticated web-based tracking program for initial and annual staff

training and orientation that can be customized to the level of the employee and the applicable regulations for their individual position. Optional modules such as enhancing computer skills are also available. Employees manage their requirements training online and receive reminders when annual or additional training is required.

Provider training on the Dual Eligible SNP Model of Care is offered through multiple learning environments. Online, providers have access to training, information and policies on the Dual Eligible SNP program through the Provider Manual and portal. Providers are notified of changes and regulatory revisions through ongoing online news articles and faxed provider updates. In-person presentations on the Dual Eligible SNP Model of Care can be conducted for medical groups interested in becoming delegated providers for the Dual Eligible SNP program. Health Net also provides a series of Dual Eligible SNP educational teleconferences for interested or delegated medical groups.

EXAMPLES:

Screenshot of Table of Contents and sample slide of Health Net associate LMS Dual Eligible SNP training.



Goals of Model of Care Training

Individuals involved in the administration of the Special Needs Plan (SNP) program will:



- Be knowledgeable of the SNP Model of Care
- Be able to define Interdisciplinary Care Team, individualized care plan and case management
- Be able to identify add-on benefits, integrated communication systems and provider network
- Understand the SNP quality improvement program
- Meet the initial and annual training requirements

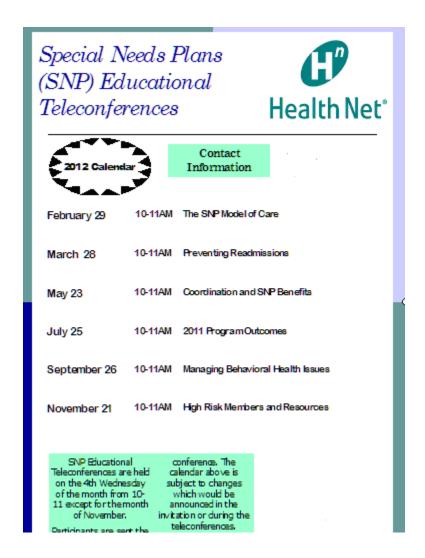
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2011 Calendar for SNP Provider Teleconferences:



2012 Calendar for SNP Provider Teleconferences



6b. Ensuring Completion of Training

Completion of required training modules is an annual compliance goal for every Health Net employee. It is a required element included in all employee's annual performance evaluations, including senior executive leadership. An amount earmarked in the Management Incentive Plan for Managers, Directors, Vice Presidents and Chief Officers is not earned if their direct reports do not complete

required training. Disciplinary action may be initiated by a Manager if associates fail to complete required training.

The Delegation Oversight team reviews the MOC functions during the annual onsite audit including MOC training. Groups that have not completed the training receive a corrective action plan and are at risk of de-delegation if training standards are not met.

EXAMPLES:

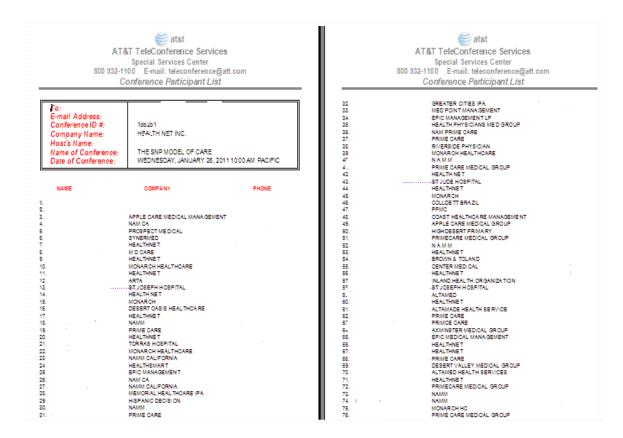
 Screenshot of e-mail sent to remind associates of required training that is due.



See bottom row of example below for training transcript for Special Needs Plans and expiration date.

| <u>Activity</u> | Start Date | Completion Date ▼ | Expiration Date | Score |
|--|------------|-------------------|-----------------|-------|
| Course: Health Net Code of Business Conduct and Ethics | 11/17/2011 | 11/17/2011 | 11/16/2012 | 92 |
| Course: The Painful Price of Healthcare Fraud | 11/10/2011 | 11/10/2011 | 11/9/2012 | |
| Course: Cultural Competency-Heritage Day Training | 8/31/2011 | 8/31/2011 | 8/30/2012 | 100 |
| Course: Medicare Compliance Material Developer Training Overview | 8/1/2011 | 8/1/2011 | 7/31/2012 | 100 |
| Course: Ergonomics - Remedy Interactive | 7/14/2011 | 7/14/2011 | | 100 |
| Course: HIPAA: An Overview | 6/16/2011 | 6/16/2011 | | 97.67 |
| Course: Pharmaceutical Fraud, Waste and Abuse_Retired Course | 5/26/2011 | 5/26/2011 | | 100 |
| Course: Records and Information Management Training Module | 5/25/2011 | 5/25/2011 | 5/24/2012 | 100 |
| Course: Medicare General Compliance Training | 5/25/2011 | 5/25/2011 | 5/24/2012 | 91 |
| Course: Escalation Process Training | 5/20/2011 | 5/20/2011 | 5/19/2012 | |
| Course: Special Needs Plans Training | 1/24/2011 | 3/14/2011 | 3/13/2012 | |

• Attendee list for Provider teleconference on SNP Model of Care training on 1/26/11, for which there were 89 attendees.



6c. Personnel Responsible for Oversight of Training

The Dual Eligible SNP Governance Committee, Medicare Oversight Committee, Medicare Compliance and the appropriate department Directors, Managers, and Supervisors are responsible for oversight of the Dual Eligible SNP Model of Care training for their respective departments. In addition to monitoring employee completion of the initial and annual training requirements, they are responsible to provide training on individual responsibilities related to the implementation of department specific components of the Dual Eligible SNP Model of Care. This

training may be offered in a classroom, teleconference, or self-study environment as appropriate.

The QI Manager of the Dual Eligible SNP Program along with key personnel from Case Management, Concurrent Review, Medicare Products, Human Resources, Provider Communications, Delegation Oversight, Appeals and Grievances, Claims, Member Services and others worked together to develop and/or conduct training. The QI Manager has 4 years of experience with the SNP Program and related CMS and NCQA regulations and standards. She has attended multiple SNP related NCQA and CMS conferences and teleconferences and also coordinates the Dual Eligible SNP Governance Committee meetings.

EXAMPLES:

Job Description Responsibilities/Qualifications of the Dual Eligible SNP QI Manager:

The Quality Improvement Program Manager will evaluate program requirements and develop a quality program implementation strategy within Medical Management. This position oversees consistent program implementation among multiple Health Net departments, regions and delegated provider groups as needed to meet regulatory requirements, quality improvement accreditation standards and related government contractual obligations.

Duties: Designs and implements quality improvement projects to address government contract requirements. Works with appropriate business units such as case management, care transitions, delegation oversight and UM to define

and lead ad-hoc teams necessary for implementing program(s). Designs and administers clinical program training across impacted regions and departments. Provides direction for the creation of new product lines (within clinical program) which require unique team-based care and assures that specific state and government regulations per the program are adhered to based on the those specificities. Manages program/project budget. Collaborates with data managers and systems managers to design and implement health outcome measurement, monitoring and reporting of program performance. Oversees the dissemination of member information reports to internal and external clients. Coordinates the collection of data as well as the maintenance and analysis of all program evaluation components. Participates in the development, implementation, and evaluation of an annual strategic plan. Manages vendor relationships. Performs other related duties as assigned.

Qualifications: Bachelor's Degree in Nursing or Master's Degree in health related field. RN preferred. *Experience*: Five years healthcare experience, including two to three years in a health plan role leading in the assessment, design and delivery of integrated health initiatives. Prior experience in technical or clinical writing, analysis and project management preferred.

6d. Actions Taken if Training Not Completed

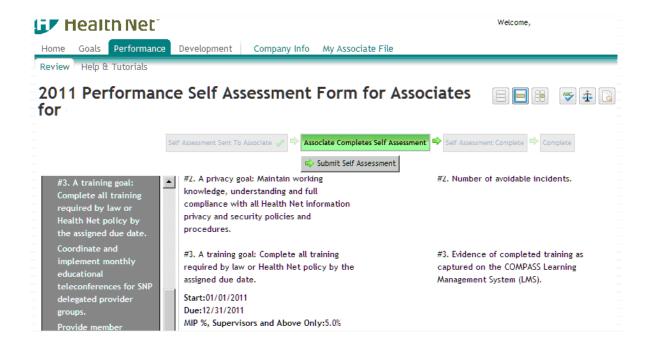
Associates will not receive annual increases if their required training is not completed. In addition, to further ensure compliance, the Management Incentive Plan for Managers, Directors, Vice Presidents and Chief Officers is affected if their direct reports do not complete required training. Disciplinary action up to and

including termination can be initiated if associates fail to complete required training.

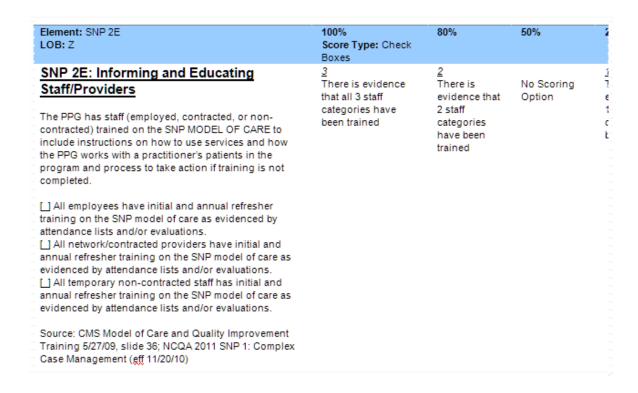
Beginning in 2011, initial and annual training on the Dual Eligible SNP Model of Care has been incorporated into Health Net's web-based Learning Management System (LMS) for efficiency and tracking purposes. The human resource department manages the LMS system and maintains the list of associates as required by their managers to complete Dual Eligible SNP MOC training. The LMS system automatically creates an electronic training record documenting the associates who have completed the training and the date completed. In addition to maintaining the associate's individual training record and providing a web-based attendance confirmation, the LMS system notifies the associate and their manager electronically when the training is due or overdue. The Dual Eligible SNP teleconferences and presentations are recorded and posted for medical groups to share with staff unable to attend.

EXAMPLES:

 Screenshot from Health Net Associate annual performance evaluation with section showing all required training to be completed. This is on all Health Net performance evaluations.



 Example of Annual Provider Audit showing section where SNP Training is evaluated and completed:



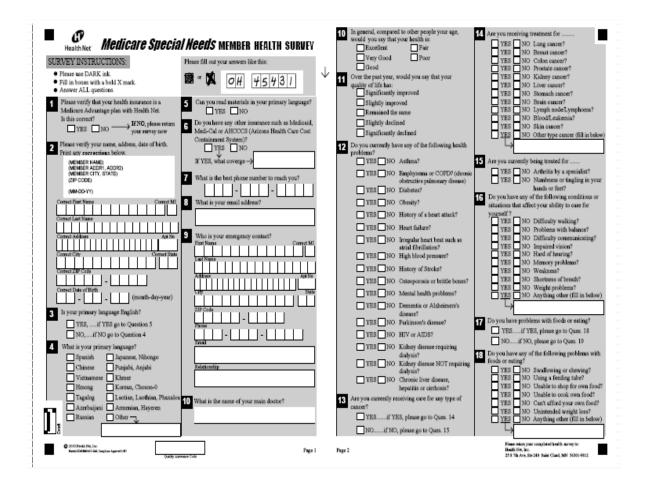
ELEMENT 7. HEALTH RISK ASSESSMENT

7a. HRA Tool

Health Net conducts an initial health assessment and annual reassessment of each Dual Eligible SNP member's medical and mental health history, psychosocial, functional and cognitive and LTSS needs. The results are evaluated by the Interdisciplinary Care Team to develop or update the member's individualized Care Plan. The assessment is primarily performed by telephone or mail and is available in threshold languages.

EXAMPLES:

Sample of HRA mailed to members if they are not reached by phone. Examples of questions from the HRA that identify risks or special needs of the population targeted by Health Net's Dual Eligible SNP program are: "What is your primary language, if not English". "Do you currently have any of the following health problems? (list of 18 common diseases such as diabetes, COPD, heart failure)" Do you have any of the following conditions or situations that affect your ability to care for yourself? (list of 9 functional disabilities such as problems with walking, balance, shortness of breath)" "During the past month, have you often been bothered by feeling down, depressed or hopeless?"



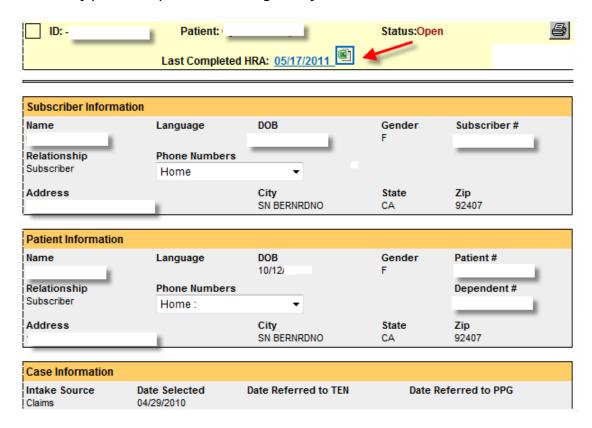
7b. How HRA is Conducted:

Telephonic outreach to complete the Health Risk Assessment (HRA) with new Dual Eligible SNP members occurs within the required number of days of member enrollment. The department performing the outreach is staffed with multilingual associates and also has access to language line services. If the member was not reached after multiple attempts, the Health Risk Assessment is mailed. A postage paid return envelope is provided to assist with returning the information. The same process is followed for established Dual Eligible SNP members to complete the reassessment HRA within 12 months of the last risk assessment.

Health Net provides medical groups delegated for Dual Eligible SNP with member information and respective responses to the assessment via the designated and secure provider portal.

EXAMPLES:

Screenshot of provider portal showing icon for most recent member HRA



7c. Personnel Reviewing / Analyzing / Stratifying HRA

Information/data is collected from the Hierarchical Condition Codes (HCC), Risk Adjustment Factor (RAF) data and Health Risk Assessment, if available, to initially stratify members into appropriate risk level based on chronic conditions and inpatient utilization for members receiving internal case management. The initial stratification is performed by data analysts based on the numerical score derived

from the member HCC, RAF and HRA responses if available. After the initial stratification, the personnel who review, analyze and assign the definitive stratification are registered and licensed nurses experienced in the principles of case management, the member's licensed Primary Care Providers, licensed clinical social workers and licensed behavioral health care providers.

EXAMPLES:

• Job Description Responsibilities/Qualifications of Data Analysts Performing Initial Stratification:

The Health Economist is responsible for the development, testing, analysis, implementation and management of the technical interface of all systems and reports for provider profiling and disease management. The Health Economist will develop and coordinate the disease management reporting initiatives in support of the medical management team, employer groups and vendors.

Responsibilities: Assists in the building of analytical/statistical models, develops databases, analyses costs and tracks utilization trends. Performs advanced statistical analysis, prepares action plans and recommendations. Prepares data for presentation to management. Acts as a technical resource. Provides analytical and statistical expertise focusing on provider profiling activities and disease management programs. Oversees disease management enrollment verification and medical cost reconciliation with vendors and auditors. Designs and develops standard, custom and ad hoc reports for business owners which require data modeling and programming in data base query tools. Provides support regarding statistical information and data to requesting departments, agencies and

corporate subsidiaries. Develops graphic, narrative and other visual presentations to clarify and substantiate data specific to the disease management programs. Analyzes and proposes system changes or enhancements to improve trending analysis for disease management programs, health care cost reporting and medical management. Provides population based analysis to determine needs for future disease management programs. Coordinates the exchange of information between profiling data and disease management to identify opportunities for member health management. Reviews and verifies utilization and cost reports to ensure their accuracy and confirm that the correct controls and procedures for collecting and analyzing data are being followed. Assures report validity through analysis and ongoing audits as well as periodic review of Health Services systems configuration.

Education: Undergraduate degree required, Master's prepared candidate preferred. Experience: Minimum five years experience in an HMO or related business, preferably working with utilization reporting required. Experience with database query tools, database management and various PC based software applications.

7d. Communication of the HRA

The member's HRA responses and risks are communicated by Case Managers during IDCT meetings and through documentation in the electronic medical management system for internally managed members. The Case Manager contacts members telephonically as they are enrolled in case management to perform a complete assessment, validate the initial risk level and follow-up on

HRA identified risks as indicated. The Case Manager, in collaboration with the IDCT, uses these guidelines to evaluate members for development of the individualized Care Plan:

- Evaluation of clinical and psychosocial information through review of HRA
 results, risk assessment scores, interviews with the member or
 family/caregiver, review of medical information, and communication with
 the member's Primary Care Physician and other clinical practitioners.
- Identification of current and potential problems and care needs based on the initial assessment
- Development of an individual plan of action, which includes the physician(s) treatment plan and appropriate community-based services and care facilities.
- Determination of the need for add-on services and benefits and incorporation into the individualized Care Plan.

Documentation of Care Plan, interventions, implementation notes and ongoing evaluation is documented in the electronic medical management system. Health Net maintains a provider portal at www.healthnet.com. Use of the provider portal is optional but encouraged; however, delegated Dual Eligible SNP providers are required to register on the portal. An additional web tool on the portal for groups delegated for Dual Eligible SNP links providers to timely and secure information on Dual Eligible SNP members. Delegated groups receive training on this portal feature that allows them to receive the monthly demographic and medical information on new Dual Eligible SNP members and the results of initial and annual health risk assessment.

EXAMPLES:

Screenshot of Provider Portal feature showing member's HRA results:

| Patient Name | DOB | SubscriberID |
|---|--------------------|--------------|
| | | |
| | | |
| Physician | HRA Completed Date | |
| | 5/17/2011 | |
| Question | Answer | <u> </u> |
| Please verify that your health insurance is a | | |
| Medicare Advantage plan with Health Net? | Y | |
| 2. Responder: | M | |
| 3. Primary language English? | Y | |
| 4. Primary lang: | - | |
| 5. Read materials: | Y | |
| 6. Other Coverage? | N | |
| 7. Name, address and date of birth? | Y | |
| 3. Phone: | Y | |
| 9. Email: | N | |
| 10. Emergency contact: | Y | |
| 11. Primary Phys: | Y | |
| 12. General health: | Fair | |
| 13. Quality of life: | Slightly declined | |
| 14. Asthma? | N | |
| 15. Emphysema or COPD? | N | |
| 16. Diabetes? | N | |
| 17. Obesity? | N | |
| 18. History of a heart attack? | N | |
| 19. Heart failure? | N | |
| 20. Irregular heart beat? | N | |
| 21. High blood pressure? | Y | |
| 22. History of stroke? | N | |
| 23. Osteoporosis? | N | |
| 24. Mental health problems? | Y | |

ELEMENT 8. INDIVIDUALIZED CARE PLAN

8a. Personnel Developing the Care Plan

Health Net's Case Management program utilizes a collaborative multidisciplinary approach that is client-focused, interactive, and goal-directed in the development, implementation and monitoring of the case management plan of

care. The Care/Case Manager works collaboratively with the IDCT, member/caregiver and the member's provider(s) to develop an individual documented plan of care incorporating information from the HRA, member assessment and other sources.

The Care/Case Manager identifies specific individual problems or concerns, in collaboration with the IDCT, to establish a Care Plan that meets the member's needs. Each problem is documented with a problem statement in the medical management system and has at least one goal and one intervention.

After identifying the member/caregiver problems and concerns, the Care/Case Manager collaborates with the member and the IDCT care team to establish short and long-term goals. Short-term goals address acute and immediate clinical, psychosocial and financial needs. Long-term goals delineate activities to sustain health improvements and optimal health status, or provide optimal support at the end of life. Evidence-based clinical guidelines (i.e.: Milliman Chronic Care Guidelines) are utilized to achieve clinically appropriate goals. All care team members agree with the goal, understand their role and are committed to achieving it.

The identified problems drive interventions and goal statements and facilitate member/caregiver participation. Goals are directed to improve health status and prevent/reduce transitions of care through improved independence and self-management, mobility and functional status, pain and symptom management, quality of life perception and satisfaction with health status and healthcare

services. Goals are **SMART**, measurable, aligned and directly linked to the problems:

- Specific: clear with target result to be achieved
- Measurable: includes quantifiable criteria of how the result will be measured such as quantity, frequency, time period, etc
- Achievable: realistic, clinically appropriate, and credible (Care/Case Manager, Medical Director, member or provider is confident that he/she has the ability to attain the goal)
- Results-oriented: stated in terms of an outcome that must be achieved and requires focused interventions and effort
- Time-bound: includes specific deadline by which the goal must be achieved that focuses attention and effort on achieving the goal results

EXAMPLES:

Case Study: Details have been summarized to ensure privacy

This is an elderly member with multiple chronic diseases such as coronary artery disease, pulmonary disease and diabetes. Member could not be reached by phone or mail and Case Manager finally located member through Social Worker. Inconsistent follow-up with primary provider and specialists as well as noncompliance with discharge instructions and medication regimen resulted in multiple hospitalizations and SNF admissions despite involvement of Home Health. HN Case Manager collaborated with the Long Term Care Case Manager for appropriate discharge plan. Member wanted to go home to family but family unable to provide care. HN Case Manager arranged patient care conference with

SNF Social Worker prior to discharge from SNF with Long Term Care Case Manager, Utilization Review Nurse, Health Net Social Worker, Health Net Case Manager, member and family. All attended IDCT except family. The member still preferred to return to home. A second care conference was coordinated with the same team members but discharge was delayed due to unstable medical condition.

Case Manager continued coordination with facility Social Worker and Long Term Care Case Manager. Member finally agreed discharge to assisted living situation was best where consistent assistance with ambulation, meals, medication, monitoring, socialization, and breathing treatments could be obtained. Result has been a dramatic decrease in emergency room use and hospitalizations.

8b. Elements Incorporated into the Care Plan

Once the problems, goals and interventions are established, agreement is reached with the member and the care team to implement the Care Plan. The Care Plan and its approval are documented in the member's record:

- Names of the multidisciplinary care team currently involved in the member's care, including specialty
- Physical care needs what care the member is receiving and what else may be needed such as home health care, home infusion, specialty services, etc.
- Equipment and supplies the services in place or being requested,
 appropriateness to the member's needs, are they being provided by a participating provider

- Caregivers and other sources of social support that provide physical, emotional, and spiritual assistance
- Alternative benefits or financial resources the member has access to or requires to meet his/her needs
- Available community resources including State, County and Community resources – what resources is the member accessing now, if any; what might he/she need for additional support such as meals assistance, transportation services, etc.
- Member's healthcare preferences and prioritization of goals.
- Intervention prioritization defines long and short-term goals with target dates for completion

Each problem and goal(s) will have associated interventions required to achieve the goal. The Care/Case Manager will document the specific type of intervention, date established and the date completed. Interventions can be completed when established or scheduled for a follow-up date. Interventions are based on appropriateness, availability, and accessibility of medical, psychosocial and financial resources. The following will be documented:

- Interventions provided for the member to achieve specific goals
- Referrals to other programs (internal and external)
- Skills training interventions structured with incremental time frames as appropriate to achieve educational and self-management goals

- Discharge interventions established to target optimal health condition and prevent re-admissions
- Development and communication of self-management plan to the member,
 their caregiver and/or his family
- The priority of the interventions based on the urgency of the problem or issue, and what is important to the member and/or family/representative
- The schedule for follow up and communication with the member and/or representative based on the member's acuity level and clinical judgment of the Care/Case Manager.

An alternative Care Plan may include a recommendation for services that are not covered by the member's benefits. The Care/Case Manager reviews the member's benefits and additional resources, including community-based services, to determine how to best support the Care Plan. Alternative funding avenues such as secondary coverage, third party liability, community-based resource, etc. are evaluated.

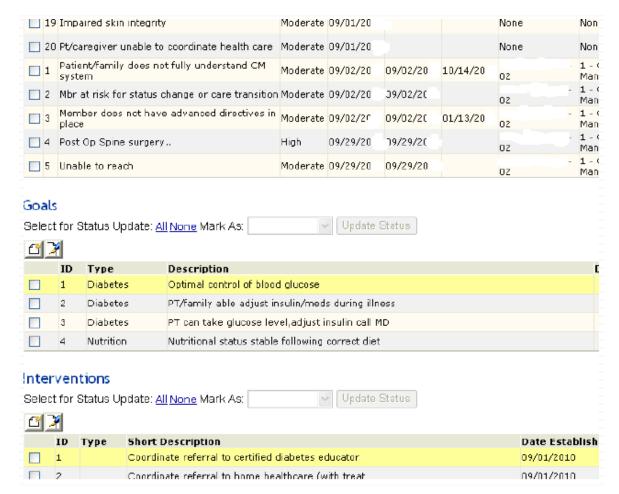
When a member has multiple conditions and/or providers, the Care/Case Manager has a key role in coordinating the member's care and providing continuity. The Care/Case Manager's established relationship and rapport with the member and/or caregivers and provider(s) help facilitate care coordination and opportunities for the Care/Case Manager to identify, develop and recommend alternative treatment services.

Working with the member and/or caregivers and the multidisciplinary care team, the Care/Case Manager implements the activities and interventions in the Care Plan. The Care/Case Manager ensures that the Care Plan contains services and interventions that are consistent with the member's health care needs, Health Net's medical policies and the member's benefits or, if no benefits are available, accessible through alternative funding or community resources. In addition:

- The Care Plan addresses the effectiveness of the treatment plan and includes interventions to address any specific treatment plan related issues
- Referrals are made to available contracted service providers, vendors, Health
 Net programs or resources, as appropriate. These may include a referral to
 disease management or Behavioral Health providers
- Referrals are made to any appropriate community resources such as disease specific or other support groups and resources, and when appropriate, programs that provide assistance with non-covered services
- If the member is on a benefit plan allowing the use of non-participating providers, the Care/Case Manager provides information to the member and provider on member out-of-pocket-costs when using a non-participating instead of a participating provider
- If the member is on an HMO plan and contracted providers are not available the Care/Case Manager works with the medical director to determine if noncontracted providers should be approved
- The Care Plan includes interventions, which support the functions of service coordination and monitoring

Screenshot of member Care Plan with problems, goals, interventions

EXAMPLE:



8c. Personnel Reviewing and Revising the Care Plan

Through ongoing assessment using system assessment tools and risk profiles the Care/Case Manager determines whether the goals continue to be appropriate and realistic, and what interventions may be implemented to achieve positive outcomes. As part of the monitoring process, the Care/Case Manager contacts the member or authorized representative and provider(s) at established timeframes based on specific interventions and/or the Care/Case Manager's

clinical judgment. Contacts should be at the minimum frequency as defined by the member's acuity level. At a minimum, the Care Plan is updated annually.

As the Care/Case Manager monitors the Care Plan and the progress towards meeting the goals, he/she evaluates the need for modification. The Care/Case Manager may base the assessment of progress on information obtained from the member or member's representative, family members, attending physician, professional and non-professional caregivers, multidisciplinary care team members and risk profiles.

If progress is not being made toward meeting the goals, the Case Manager should reassess the case to identify barriers. Examples of these may include:

- Insufficient information for the Case Manager or provider(s) to fully understand the case due to missing information, family dynamics, and/or lack of care coordination
- Member or representative not willing to participate in case management.
- Resistance of member or representative to change
- Lack of communication between member and his/her family or providers or other psychosocial concerns.
- Lack of advance directives
- Lack of an effective strategy for managing home care
- Unidentified or un-manageable psychosocial issues with the member and/or family or caregivers.

 Lack of rapport between the member and the Case Manager or the attending provider(s) and the Case Manager.

A behavioral health team member should be consulted as indicated to address identified psychosocial barriers.

EXAMPLES:

• Case Study - Details have been summarized to ensure privacy

This case illustrates frequent updates to the Care Plan necessary when members have changes in medical condition. This is an elderly member with diagnosis of cancer and surgery complicated by swallowing problems and weight loss that resulted in a feeding tube. Primary support system was an involved family. Member had been living independently prior to surgery. Interventions included coordination with home health, primary doctor and family and addressing psychological needs of member. Case Manager updated Care Plan and communicated with family and member as member declined functionally and needed more assistance at home. Eventually member was not able to be maintained at home and relocated to Assisted Living facility. Primary doctor provided with updated Care Plans as member's condition changed. Case Manager coordinated care and eventually hospice services, updating Care Plan, interventions and goals as member's condition changed.

8d. Documentation of the Plan of Care

The Plan of Care is documented and maintained in the secure electronic medical management system. It is accessible to the internal IDCT members electronically.

IDCT members that do not have access to the electronic medical management system are provided with hard copies as appropriate. Health Net's state, national, and professional confidentiality regulations and guidelines govern all communications between the care manager, the participant and members of the participant's treatment team as necessary to implement the care management plan. All HIPAA and document security policies are followed to ensure privacy and confidentiality; no voluntary disclosure of participant-specific information will be made, except to persons authorized to receive such information. Health Net staff must follow release of information procedures.

EXAMPLES:

• Table of Contents for Health Net's Privacy Program in compliance with HIPAA regulations



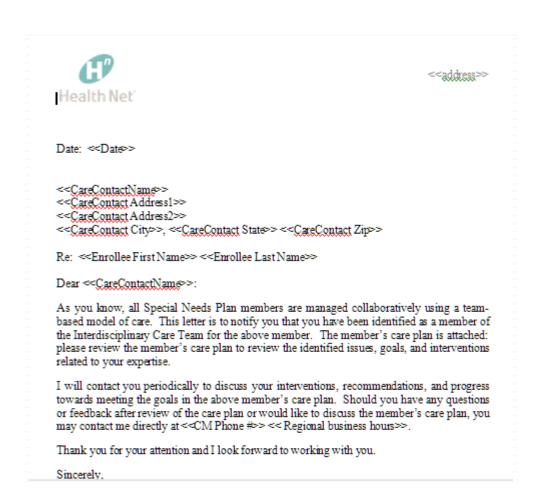
TABLE OF CONTENTS Policy Title NOTICE OF PRIVACY PRACTICES. 1 MINIMUM NECESSARY USE AND DISCLOSURE OF PROTECTED HEALTH INFORMATION USE AND DISCLOSURE FOR RESEARCH PURPOSES 59 MARKETING 67 DE-IDENTIFICATION OF PROTECTED HEALTH INFORMATION AND LIMITED DATA SETS REQUESTS TO AMEND RECORDS MAINTAINED BY HEALTH NET 119 DENYING A REQUEST TO AMEND RECORDS MAINTAINED BY HEALTH NET 127 REQUESTS TO RESTRICT USES AND DISCLOSURES OF PROTECTED HEALTH

8e. Communication of the Care Plan and Revisions

The member is included in the development of their Care Plan whenever feasible and the Case Manager communicates with the member telephonically to discuss revisions as they occur. A hard copy of the Care Plan is sent to the PCP to discuss and share with the member. The member can be provided with a hard copy of the Care Plan upon request. Internal members have access to the Care Plan through the electronic medical management system. External IDCT members such as the PCP are sent a hard copy of the Care Plan.

EXAMPLES:

• Cover Letter to PCP sharing Care Plan:



ELEMENT 9. COMMUNICATION NETWORK

9a. Communication Network Structure

Health Net maintains a comprehensive medical management system and intranet for internal departments, a contact center and user friendly website for members and providers. The communication systems are varied to meet the needs and abilities of the various groups and individuals that will be utilizing them and include member and provider newsletters and online articles. In addition to specific department monitoring activities for efficiency and effectiveness, the QI

department monitors the quality of communication systems as part of the annual integrated member satisfaction report and provider satisfaction surveys.

EXAMPLES:

Medical Management System: Health Net utilizes an electronic medical management system for member medical records and the review and authorization of services and claims. Membership and provider data from the claims systems are fed into the medical management system on a daily basis to synchronize and facilitate the processes of review and authorization. In addition to following HIPAA privacy regulations, validity and consistency edits are employed throughout to ensure data integrity.

The internal electronic medical management system allows case management, concurrent review, and the hospital notification unit to document member information in the system so it is available to the complete Health Net team. This facilitates appropriate interventions and timely management for members in the Dual Eligible SNP model of care. A comprehensive set of evidence-based assessments and Care Planning programs are embedded in the documentation system for the Case Management process.

• Member Services Contact Center: to meet the unique needs of members and providers, health net operates a Medicare or dual eligible SNP member services center with dedicated associates. The associates staffing the center are trained on the dual eligible SNP model of care, including coordination of benefits and the provider network, to effectively assist members and providers. The member services center contact information is included on the

member's ID card. In addition to access to language line services, they are also staffed with bi-lingual employees to better assist members.

- Provider Portal: Health Net maintains a provider portal at www.healthnet.com with easy and secure access to the provider manual, newsletters, medical policies, eligibility, claims, hospitalization notification, authorizations and pharmacy information. Providers can also validate if members are involved in health coaching or intensive case management. Use of the provider portal is optional but encouraged; however, delegated Dual Eligible SNP providers are required to register on the portal. An additional web tool on the portal for groups delegated for Dual Eligible SNP links providers to timely and secure information on Dual Eligible SNP members. Delegated groups receive training on this portal feature that allows them to receive the monthly demographic and medical information on new Dual Eligible SNP members and the results of initial and annual health risk assessment.
- Member Website: The member portal on the Health Net website provides a variety of convenient features and access to benefit and health information. Members are encouraged to create their own personal health record with appointment history, medical information and medication list stored in an accessible and secure environment. An interactive program allows members to obtain comprehensive medication information including drug/drug interactions, purpose and precautions. Automatic reminders for preventive health such as seasonal influenza vaccines or recommended screenings can be personalized to the member's demographics.

In addition, the member website contains a large variety of health information. Decision Power utilizes Healthwise® Knowledgebase, a comprehensive online source of validated health information that provides detailed materials on over 6,000 health topics including chronic disease management and decision support. The content in the Knowledgebase is reviewed and updated quarterly. Web-based interactive toolkits for weight management and smoking cessation offer additional support and encourage self-management skills.

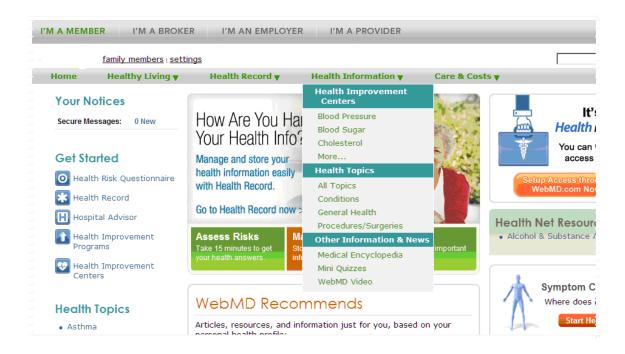
9b. Connection of Stakeholders

Stakeholders are connected via the specific communication network that will meet their business, personal, educational or health needs as established by Health Net. The member is central to all communications and is kept informed via phone calls and mail from the Case Manager. Members can also receive disease management information by mail or electronically from the member portal. The internal IDCT members are connected via the electronic medical management system for member information and the intranet for e-mail communications. The Member Services Contact Center for members and providers has access to the member information necessary to assist members to resolve any questions or issues and can also quickly connect to their Case Manager if additional follow-up is needed. Providers have access to member information on the provider portal in addition to phone and mail communications they receive from the Case Manager. External IDCT members other than the PCP receive communications by phone or mail and records of

this communication are entered into the electronic medical record system by the Case Manager. Information from Health Net's network of communication systems is available to regulatory bodies following established privacy and information management policies.

EXAMPLES:

Screenshot from the member portal at <u>www.healthnet.com</u>



9c. Preservation of Communication

All communication of the delivery of member services is preserved according to Health Net's established information management policies and procedures. The Case Manager records communication with members, providers and IDCT members in the Activity Notes of the electronic medical management system - examples of which are included in the IDCT section. Annual Medicare Newsletters are preserved and archived on the Marketing

intranet site. Minutes and attendance from the Dual Eligible SNP Governance Committee are recorded, distributed and approved at the subsequent meeting.

EXAMPLES:

 Agenda from SNP Governance Meeting showing Agenda Item regarding approval of minutes.



| # | Description | Responsible Party | Time/ Mins. |
|----|---|-------------------|----------------|
| 1. | Review and Approve Minutes 11/14/2011 | All | 3 |
| 2. | Monthly CM Metrics: MHN – Metrics (pending) PPG – Metrics (under attachments) CA & AZ – Metrics (xx) | | 15 |
| 3. | Monthly SNP Report | | 15 |
| | | | |

9d. Oversight Responsibility

The Web Center of Excellence (WCOE) is the award winning department responsible for planning, design, development and maintenance of the member and provider portals. The Vice President of Information Systems and Chief Information Officer are responsible for oversight, system security and providing

the information architecture to meet Health Net customer needs by leveraging technology, best practices, and standards to improve productivity and overall efficiency of associates and systems. The Vice President of the Contact Centers and Chief Customer Services are responsible for oversight of the Member Services Contact Center to ensure employees that interface with members are knowledgeable of benefits, services and processes to be able to handle member calls in a professional, efficient and timely manner.

The Vice President of the Quality Management Department and the Dual Eligible SNP Program Manager are responsible for the oversight of the company-wide Quality Improvement and Dual Eligible SNP Care Management Programs' overall effectiveness and communications. The oversight responsibility includes functioning as the Chairperson and facilitator of the Dual Eligible SNP Governance Committee and communication of the overall effectiveness of care to the membership of that committee. Written minutes are maintained for every meeting, including reports on utilization and outcome measures. Items communicated at the Dual Eligible SNP

Governance Committee include, but are not limited to:

- Monthly Case Management metrics: medical, behavioral, delegated
- Monthly and quarterly Dual Eligible SNP Reports
- Training and Regulatory Updates
- Discussion of progress towards goals and barriers
- Clinical care and service delivery (by provider) updates

• Job Description Responsibilities/Qualifications of IT Director:

The IT Director ensures that established security practices and processes are followed at Health Net while using external vendors for service delivery, supports Health Net legal functions as they pertain to IT services and functions at Health Net, conducts periodic review and audit of services and practices of Health Net and vendor delivered services. Manages the execution of the following:

Security Management: Response and incident management for major security events. Risk management, assessment and validation. Owns Information Security Policy. Owns ITG policy and review. Forensics and investigations. Manage and conduct periodic review and audit of security practices. Manage reporting activities as required. ITG representation for all security committees and processes. Single point of contact for IT related security matters. Company information security awareness and education program.

Compliance and Legal Support: Coordinates with other functions to define and perform audit functions as required to document and ensure vendor compliance (includes contract, service, security, architecture, etc.). Reporting functions related to audit activity. External audit management and tracking. Definition, management and review of the Data Control process; to include formal definition of business and system owners and processes to conform to SOX requirements. Audit and periodic review of the Data Control function. ITG aspects of business continuity. ITG representation for all legal needs and processes. ITG

representation for all compliance committees and processes. Single point of contact for compliance, legal and business continuity matters.

Education and Experience: Bachelor's Degree in one of the following subject areas: Computer Science, Business Administration, or related field preferred or equivalent relevant work experience. CISSP certification is a plus. Five to eight years work experience in IT with direct experience in legal, compliance and security related operations are required. Additionally, minimum five years demonstrated budget management is required. Demonstrated understanding of the processes in use at Health Net as they relate to security, compliance and legal support is desired

ELEMENT 10. CARE MANAGEMENT FOR HIGH RISK POPULATION

10a. Identification

The member's initial stratification is automated for non-delegated members and based on criteria combining the Risk Adjustment Factor/Hierarchical Condition Categories (RAF/HCC) and/or HRA scores when available. The stratification level assignment allows members to move between stratification levels to meet changing levels of need across the care continuum. The goal of automated stratification is to optimally categorize members in the correct level of acuity. Definitive categorization occurs when the clinical assessment is conducted by Case Managers. Upon member status changes and at least annually, stratification could be revised based on Case Manager determination.

The initial stratification occurs as part of the HRA, soon after member enrollment. The initial automated stratification is done once and members are assigned to the responsible case management group:

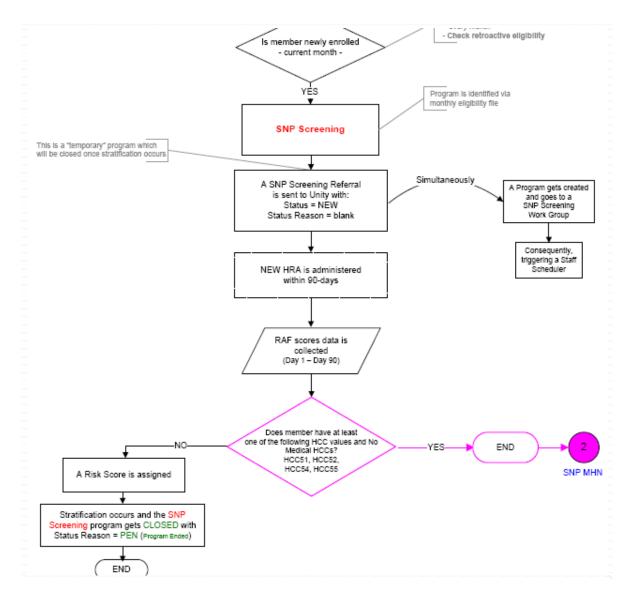
Health Net will provide case management for those members that do not belong to a Dual Eligible SNP delegated medical group

Medical Groups delegated for Dual Eligible SNP will provide team based services for their members

Managed Health Network (MHN), Health Net's behavioral health division will provide team based services for those members with mental health diagnosis only A report of the members and respective HRA responses will be communicated to the appropriate delegated groups via the secure provider portal. Once member stratification is received, the Health Net Case Manager conducts a telephonic clinical assessment and validates the assigned level. The stratification is determined across three dimensions: medical, psychosocial, and cognitive/functional. If stratification levels are revised based on the assessment, it is documented in the medical management system.

In addition, automated surveillance triggers (e.g. daily authorization/discharge data,) are utilized to provide early identification of members at risk that may require case management intervention.

Member screening, identification and risk stratification flow chart



10b. Add-on Services and Benefits

A combined Medicare/Medi-Cal benefit package, enhanced with additional valueadded benefits and services, will be offered as a means of helping beneficiaries meet their health care needs. Health Net supports including additional valueadded benefits and services to the extent they are supported by actuarially-sound fiscal rates.

- Transportation Services: Health Net provides a variable number including unlimited medically related trips annually according to the individual Dual Eligible SNP plan. The member can bring a caretaker or family member for no charge. This promotes member access to medical services and compliance with the medical goals of the Care Plan.
- Dental/Vision Benefit: The dental and vision benefits can be core or buy-up benefit depending on the individual Dual Eligible SNP plan. Dental can range from diagnostic x-rays, preventive cleaning and services, restorative amalgam dental treatments and discounts for other services to a comprehensive dental benefit. The vision benefit includes an annual eye exam, eyeglasses.
- Dual Eligible SNP members that meet inclusion criteria are enrolled in the Medication Therapy Management (MTM) program with quarterly medication reviews by a pharmacist. The review looks for evidence of noncompliance, gaps in care, duplication or potential for adverse reactions and the member, Doctor and Case Manager receive the results of the review when problems are identified in addition to contact information to speak with a pharmacist. This communication among the team members facilitates follow-up with the member regarding medication issues.

- Disease Management (DM) with access to a licensed health coach (RN, Respiratory Therapist, Dietician) 24 hours a day/7 days a week for education and counseling regarding health concerns. The focus is to identify and outreach to members with the five major chronic diseases of diabetes, hypertension, chronic obstructive pulmonary disease, coronary artery disease and congestive heart failure. In addition to mailed educational materials, videos, and educating the member how to manage their disease process, there is access to interactive programs on the member portal regarding smoking cessation, increasing physical activity and weight management and a comprehensive library of health education.
- Intensive Case Management: All Dual Eligible SNP members are enrolled in case management and stratified according to care needs. In addition, for a small subset of members with conditions such as ESRD, catastrophic or end-of-life situations, members can be enrolled in more specialized intense case management programs going beyond home visits, assessments and coordination of care to include stabilization of highly complex medical care plans. Care needs may include mental health services from County or Plan contractors and community based services or IHSS.
- In addition, Dual Eligible SNP members stratified as high risk by Health Net for internal case management may receive the following interventions as indicated by their individualized Care Plan:
 - HRA and initial assessment done at least annually

- Condition specific assessment and condition detail performed at least quarterly for members with any applicable HCC condition (all conditions assessed).
- Milliman CM guidelines utilized for condition specific Care Plan and interventions, as appropriate
- If available, utilize internally developed evidence based conditions specific to case management process guidelines, such as Diabetes, COPD, CHF, and Renal Failure
- Coordination of multiple services, such as home health, PT, OT, wound care, DME, specialty visits, etc. (5+)
- Coordination of social services to manage activities of daily living and nutrition
- Coordination of care with multiple external entities (i.e. Department of Social Services, Medicaid, County Mental Health Services, Ombudsman Services, County Assessment Agencies and IHSS workers etc.)
- Referral for health coaching/disease management
- Surveillance for potential status changes such as ER visits, hospitalizations, claim data
- Case Manager in contact with member at least monthly and more frequently as indicated by member needs/Care Plan goals

 Case Management/IDCT follow-up and Care Plan update with member/caregiver is at least quarterly and when there are any status changes.

ELEMENT 11. PERFORMANCE AND HEALTH OUTCOMES MEASUREMENT

11a. Evaluation of the MOC

Evaluation of the effectiveness of the Dual Eligible SNP Model of Care occurs at least annually as part of the overall Health Net Quality Improvement Program. Metrics may be reported monthly, quarterly or annually depending on the established procedure for the specific metric. Standard processes for evaluating health outcomes, access, member satisfaction, etc. are utilized along with new procedures developed to allow for the analysis of Dual Eligible SNP specific outcomes. Table 9 describes specific metrics according to the goals in Element 2a, data source of the metric and comparison outcomes or performance goals. Dual Eligible SNP outcomes are compared to the performance goal or available Dual Eligible SNP or Medicare value, although Medicare comparisons should be viewed with caution.

Table 9

| Health Outcomes Measurement | |
|---|--------------|
| Improved Access to Essential Services: Medical, Mental | Performance |
| Health, and Social Services | Goal or |
| | Available |
| | Comparison |
| | Value |
| Member Survey CAHPS Measures | National |
| | Medicare Avg |
| Composite result for "Getting Needed Care" | 91.9 |
| Composite result for "Getting Care Quickly" | 79.0 |
| Composite result for "Getting Needed Prescription Drugs" | 95.0 |
| Provider After Hours Survey | Performance |
| | Goal |
| Percent After-Hours Physician availability within 4 hours | 90% |
| Percent After-hours Emergency Instructions | 90% |
| Behavioral Health Access (Commercial/Medicare) | |
| , , , , | |
| Percent members reporting able to get routine appointment | 80% |
| | 80% |
| Percent members reporting able to get routine appointment | 90% |
| Percent members reporting able to get routine appointment in 10 days | |
| Percent members reporting able to get routine appointment in 10 days Percent members able to get urgent care within 48 hours | 90% |

| Health Outcomes Measurement | |
|---|--------------|
| Quality of Service Access Grievance Rate (PTMPY) (N) | 1.14 (150) |
| Quality of Care Access Grievance Rate (PTMPY) (N) | 0.03 (4) |
| HEDIS® Measure – Board Certification | |
| Family Medicine | 66.15 |
| Internal Medicine | 75.28 |
| Other Physician Specialists | 78.69 |
| | National SNP |
| | Mean |
| Geriatricians | 54% |
| CAHPS Member Survey | National |
| | Medicare Avg |
| CAHPS Overall rating of Personal Doctor | 92.5% |
| CAHPS Overall Rating of Specialists | 90.8% |
| CAHPS Composite score for "Doctors who communicate well" | 94.6% |
| Overall percent compliance with Dual Eligible SNP Model of | 80% |
| Care criteria from Delegation Oversight audit tool for Dual | |
| Eligible SNP delegated groups (66) | |
| Availability | Performance |
| Availability | |
| Availability | Goal |
| Percent members with 1 PCP within 15 miles or 30 mins from | Goal 90% |

| Health Outcomes Measurement | |
|--|-------------|
| Percent members with 1 High volume BHP within 15 miles or | 90% |
| 30 mins from residence | |
| Percent members with 1 Hospital within 15 miles or 30 mins | 90% |
| from residence | |
| Percent members with 1 ER within 15 miles or 30 mins from | 90% |
| residence | |
| Percent members with 1 Pharmacy within 15 miles or 30 mins | 90% |
| from residence | |
| Percent members with 1 Specialist within 15 miles or 30 mins | |
| from residence (for each high volume specialty type) | |
| Orthopedic Surg. | 90% |
| Gastroenterology | 90% |
| Cardiology | 90% |
| Neurology | 90% |
| Ophthalmology | 90% |
| Improved Access to Affordable Care | HN Medicare |
| Percent Geo-Access Availability of Providers Contracted | Performance |
| for Medicare and Medicaid | Goal |
| PCP | 90% |
| Specialists | 90% |

| Health Outcomes Measurement | |
|--|---------------------|
| Improved Coordination of Care Through an Identified | |
| Point of Contact | |
| Mean rate of compliance with criteria for audit of Dual Eligible | 90% |
| SNP Case Management files (Non-delegated members) | |
| Percent overall compliance with criteria for audit of Dual | 95% |
| Eligible SNP files (delegated members) | |
| Percent Non-delegated members with Care Plan established | 100% |
| Percent Behavioral Health members with Care Plan | 100% |
| established | |
| Percent Delegated members with Care Plan established | 100% |
| _ | |
| Improving Seamless Transitions of Care Across Health Care | Performance |
| Improving Seamless Transitions of Care Across Health Care Settings, Providers and Health Services | Performance Goal |
| | |
| Settings, Providers and Health Services | Goal |
| Settings, Providers and Health Services % Documentation that Plan of Care communicated to | Goal |
| Settings, Providers and Health Services % Documentation that Plan of Care communicated to Receiving Setting within 1 business day of notification of | Goal |
| Settings, Providers and Health Services % Documentation that Plan of Care communicated to Receiving Setting within 1 business day of notification of hospital admit or discharge to next setting (Behavioral Health) | Goal 95% |
| Settings, Providers and Health Services % Documentation that Plan of Care communicated to Receiving Setting within 1 business day of notification of hospital admit or discharge to next setting (Behavioral Health) % PCP Notification of Hospital Discharge in 5 days (Behavioral | Goal 95% |
| Settings, Providers and Health Services % Documentation that Plan of Care communicated to Receiving Setting within 1 business day of notification of hospital admit or discharge to next setting (Behavioral Health) % PCP Notification of Hospital Discharge in 5 days (Behavioral Health) | Goal 95% |
| Settings, Providers and Health Services % Documentation that Plan of Care communicated to Receiving Setting within 1 business day of notification of hospital admit or discharge to next setting (Behavioral Health) % PCP Notification of Hospital Discharge in 5 days (Behavioral Health) % of hospital discharges to home receiving post-hospital | Goal 95% |
| Settings, Providers and Health Services % Documentation that Plan of Care communicated to Receiving Setting within 1 business day of notification of hospital admit or discharge to next setting (Behavioral Health) % PCP Notification of Hospital Discharge in 5 days (Behavioral Health) % of hospital discharges to home receiving post-hospital discharge calls in 5 business days (Behavioral Health) | 95% 95% |

| Health Outcomes Measurement | |
|--|--------------|
| % PCP Notification letter within 5 days of Hosp Discharge | 95% |
| (Non-Behavioral Health) (Dual Eligible SNP Non-delegated) | |
| Average Number of Days Post- Hospital Discharge Call (Non- | 2.0 Days |
| Behavioral Health) (Dual Eligible SNP Non-delegated) | |
| % Dual Eligible SNP members that have been hospitalized or | 90% |
| in a nursing home responding "Yes" "Did you have the | |
| information you needed upon discharge regarding | |
| medications and follow-up care?" (Yes/No) | |
| HEDIS® Measures | |
| Follow-up after Hospitalization for Mental Illness | Medicare Avg |
| 30-day Follow-up | 54.2% |
| 7-day Follow-up | 37.1% |
| All Cause Readmission | NA |
| | SNP Mean |
| Medication Reconciliation Post-Discharge | 30% |
| Improved Access To Preventive Health Services | Medicare Avg |
| HEDIS® Measures | |
| Colorectal Cancer Screening Rate | 54.5% |
| Glaucoma Screening in Older Adults Rate | NA |
| Percent members that answered "Yes" to: "Did you get a flu | 66.3% |
| shot since September 1, 2009?" | |
| Percent members that answered "Yes" to: "Have you ever had | 69.0% |
| a pneumonia shot?" | |

| Health Outcomes Measurement | |
|--|----------|
| Assuring Appropriate Utilization of Services | HN |
| Assuming Appropriate Still 2 attorners | Medicare |
| Hospital admit rate (PTMPY) | 252.6 |
| Hospital readmit rate - 30 day | 14.9% |
| Emergency Room rates (PTMPY) | 271.5 |
| SNF days (PTMPY) | 1,144.9 |
| Utilization Metrics Behavioral Health | MHN SNP |
| Acute Psychiatric Inpatient admit rate (PTMPY) | 24.9 |
| Acute Psychiatric Inpatient readmit rate -30 day | 22.3% |
| Detox Inpatient admit rate (PTMPY) | 2.1 |
| ER visit rate MHN (PTMPY) | 12.5 |
| Partial Hospitalization Program (PHP) Admits/1000 | 2.7 |
| Intensive Outpatient Program (IOP) Admits/1000 | 4.7 |
| Residential Treatment Center (RTC) Admits/1000 | 0.7 |
| IHSS Hours/1000 | TBD |
| Home Health Visits/1000 | TBD |
| Long Term Care Admits/1000 | TBD |
| Improving Beneficiary Health Outcomes | |
| HEDIS® Measures | Medicare |
| | Average |
| Use of Spirometry Testing in the Assessment and Diagnosis of | 28.5% |
| COPD | 20.370 |
| Pharmacotherapy Management of COPD Exacerbation | |

| Health Outcomes Measurement | |
|---|-------|
| Systemic Corticosteroid | 61.0% |
| Bronchodilator | 76.1% |
| Persistence of Beta-Blocker Treatment After a Heart Attack | 82.6% |
| Osteoporosis Management in Older Women Who Had a Fracture | 20.4% |
| Antidepressant Medication Management | |
| Effective Acute Phase Tx | 63.3% |
| Effective Continuation Phase Tx | 50.2% |
| Annual Monitoring for Patients on Persistent Medications | |
| ACE Inhibitors or ARBs | 90.1% |
| Digoxin | 92.3% |
| Diuretics | 90.4% |
| Anti-Convulsants | 69.8% |
| Potentially Harmful Drug-Disease Interactions in the Elderly* | |
| Falls + Tricyclic Antidepressants/Antiphycotics | 16.8% |
| Dementia+Tricyclic Antiderpressants/Anticholinergic Agents | 28.7% |
| CRF+Nonaspirin NSAIDs/Cox-2 Selective NSAIDs | 11.7% |
| Total | 23.4% |
| Use of High Risk Medications in the Elderly* | |
| 1 Drug | 23.3% |
| 2 or More Drugs | 5.8% |
| Comprehensive Diabetes Care – LDL Screening (C-SNP only) | 87.2% |

| Health Outcomes Measurement | |
|--|--------------|
| | SNP Mean |
| Controlling High Blood Pressure | 52% |
| Annual Monitoring for Patients on Persistent Medications Total | 90% |
| HEDIS® Care for Older Adults (COA) | |
| Advance Care Planning | 16% |
| Medication Review | 53% |
| Functional Status Assessment | 28% |
| Pain Screening | 38% |
| Satisfaction with Health Status and Healthcare Services | Medicare Avg |
| Member Survey CAHPS Measures | |
| Overall Rating of Health Plan | 84.1% |
| Overall Rating of Care received | 85.4% |
| Overall Rating of Personal Doctor | 92.5% |
| Composite score for CAHPS "Health Plan Customer Service" | 91.0% |

In addition to the metrics collected for each goal in Table 9, Health Net also monitors HRA completion rates, delivery of add-on services, member's health status and communication systems. The following data sources will be collected and analyzed as part of the annual evaluation of the Dual Eligible SNP Model of Care to evaluate quality and health outcomes for the Dual Eligible SNP program. See Table 9 for specific metrics.

- Health Outcomes HEDIS® measures, utilization metrics for admits to hospital/SNF, ER visits, hospital readmits, member survey
- Access to Care member satisfaction surveys, appeals and grievances re: access, provider after hours surveys, monitoring of provider network, utilization reports
- Improvement in Health Status related HEDIS® measures, responses to HRA questions re: health status, pain, functional status, self-management
- Implementation of Model of Care NCQA Structure and Process measures,
 Delegation Oversight audits of Medical Groups
- Health Risk Assessment –initial and annual completion rates
- Implementation of Care Plan –audits of case management records
- Provider Network Geo-access surveys for adequacy of network, % open panels, provider to member ratios, hospital bed capacity, member and provider satisfaction surveys
- Continuum of Care related HEDIS® measures, response to HRA question regarding transitions, transition of care audits
- Delivery of Extra Services utilization for transportation, Decision Power,
 Alere Case Management, Medication Therapy Management program,
- Integrated Communications- Member Services Contact Center (average speed to answer, abandonment rate), member and provider satisfaction surveys

11b. Personnel Responsible to Collect, Analyze, Report MOC Evaluation

Health Net has provided extensive resources to the Dual Eligible SNP program to meet the comprehensive data collection, analysis and evaluation requirements. The Dual Eligible SNP QI Program Manager, BSN, CPHQ is dedicated to the program along with Master or Bachelor prepared Research Analysts in Public Health, Biostatistics, Epidemiology and Business Economics who also participate in the data collection, analysis and program evaluation.

- The QI Manager for the Dual Eligible SNP Program holds a Bachelor of Science in Nursing and is a Certified Professional in HealthCare Quality, CPHQ. She has 4 years of experience working with the Dual Eligible SNP Program at Health Net and has participated in the NCQA evaluation process of the Dual Eligible SNP program since 2008. She has attended multiple CMS and NCQA conferences and webinars to further her knowledge of Dual Eligible SNP regulations and standards and participated as a speaker at the January 2010 NCQA Conference on Special Needs Plans in Baltimore.
- The QI Manager of Health Net's Research and Analysis team holds a Masters in Epidemiology and heads up a team of 5 Master or Bachelor prepared Senior Analysts who are available to support the Dual Eligible SNP QI Manager with statistical analysis and reports. The QI team also has a DrPH in Biostatistics who has assisted with the Dual Eligible SNP reports and evaluations.

11c. Improvement of the MOC

The analyzed results of the Dual Eligible SNP MOC are reported annually to the Dual Eligible SNP Governance committee and the CMACQC. Metrics are identified for potential improvement when they are substantially below the available reference value or performance goal.

The potential areas for improvement identified through data collection are prioritized based on compliance with regulatory guidelines, NCQA standards, performance as compared to the reference value and the ability to effectively address identified barriers. Although improvement activities have been implemented for the majority of the identified areas, the implemented actions that follow (Table 10) address the metrics prioritized for improvement.

EXAMPLES:

 Table 10 below is an excerpt from the 2010 Dual Eligible SNP program evaluation showing actions taken to address barriers and improve Dual Eligible SNP Program outcomes.

Table 10

| Opportunity | Action Taken to Address Identified Barriers to |
|-------------------------|---|
| Opportunity | Improved Performance |
| Health Outcomes and | |
| Use of Evidence Based | |
| Practices | |
| (DAE) High Risk Drugs | High Risk Medications in the Elderly is a Health Net |
| in Elderly - 1 Drug | Pharmacy Services initiative with annual mailing of |
| DAE) High Risk Drugs in | member profiles and educational materials to providers. |
| Elderly - 2 Drugs | In 2010, the medication profiles of 70,986 Medicare |
| | members were reviewed and 10,845 were targeted for |
| | intervention. Provider outreach occurred in September |
| | 2010 and outcomes at 6 months demonstrated 65% |
| | decrease in use of targeted medications. Educational |
| | materials are also available on the provider and member |
| | portals. Plans to enhance this project for 2011 will be |
| | more frequent identification of members, increase |
| | targeted high risk medications and a member |
| | intervention. |
| (OMW) Osteoporosis | The Quality Improvement Department and Health Net |
| Management Women | Pharmacy conduct an osteoporosis initiative. In July |
| | 2010, the intervention was increased from annual to |
| | monthly outreach to reach more high-risk members. |
| | Medicare members targeted for the outreach are aged |

| Opportunity | Action Taken to Address Identified Barriers to |
|----------------|---|
| Opportunity | Improved Performance |
| | 65 to 90 with an osteoporotic fracture in the previous |
| | three months who have not received a bone-mineral |
| | density (BMD) test or are not on active osteoporosis |
| | treatment. Educational materials are mailed to |
| | members and patient profiles/intervention alerts are |
| | faxed to the members' physicians. |
| | Members are also encouraged to obtain personalized |
| | assistance from Decision Power Health Coaches. |
| | Educational materials are posted on healthnet.com |
| | member and provider portals. |
| Emergency Room | Health Net Case Managers and Decision Power Health |
| Utilization | Coaches educate SNP members on self-management of |
| | chronic disease in order to avoid emergencies and |
| | promote regular visits to the PCP. |
| | All new members receive enrollment verification calls. |
| | Health Net associates verify member understanding and |
| | provide education if necessary on accessing services in a |
| | managed care health plan. |
| | In Jan 2011, Health Net began calling Medicare |
| | members to encourage annual physicals and assist |
| | members to make appointments with their PCP so |
| | diseases can be properly managed in the doctor's office |

| Opportunity | Action Taken to Address Identified Barriers to |
|-------------------|--|
| Оррогини | Improved Performance |
| | avoiding inappropriate trips to the ER. |
| | The 2011 Medicare Mailer includes an article, "When is |
| | the Emergency Room the Right Choice?" discussing the |
| | difference between urgent care and emergent care. |
| Access to Care | |
| (FSO) Flu Vaccine | The 2010 Medicare newsletter mailed to all Medicare |
| (PNU) Pneumonia | members includes a tear-out chart with guidelines for |
| Vaccine | preventive screening and specific articles on the |
| | importance of flu and pneumonia vaccines. In addition, |
| | Health Net conducts annual call and postcard campaigns |
| | for at risk Medicare members to remind them to obtain |
| | their flu and pneumonia vaccines. |
| | Decision Power Health Coaches and Health Net Case |
| | Managers also remind and encourage members to |
| | obtain Flu and Pneumonia vaccines in addition to other |
| | preventive care. |
| | The Dual Eligible SNP program also includes a |
| | transportation benefit ranging from unlimited trips for |
| | HNCA's largest Dual Eligible SNP to 20 one way trips for |
| | the HNAZ Dual Eligible SNP to further promote access to |
| | preventive care. |

| Opportunity | Action Taken to Address Identified Barriers to | | |
|---------------------|---|--|--|
| Оррогили | Improved Performance | | |
| Transitions of Care | | | |
| Emergency Room | Health Net Case Managers and Decision Power Health | | |
| Utilization | Coaches educate SNP members on self-management of | | |
| | chronic disease in order to avoid emergencies and | | |
| | promote regular visits to the PCP. | | |
| | All new members receive enrollment verification calls. | | |
| | Health Net associates verify member understanding and | | |
| | provide education if necessary on accessing services in a | | |
| | managed care health plan. | | |
| | In Jan 2011, Health Net began calling Medicare | | |
| | members to encourage annual physicals and assist | | |
| | members to make appointments with their PCP so | | |
| | diseases can be properly managed in the doctor's office | | |
| | avoiding inappropriate trips to the ER. | | |
| | The 2011 Medicare Mailer includes an article, "When is | | |
| | the Emergency Room the Right Choice?" discussing the | | |
| | difference between urgent care and emergent care. | | |
| Transitions of Care | | | |
| Notification of | The transition of SNP members transferred to non-acute | | |
| Admission to Non- | from an acute facility including establishment of the | | |
| acute Facility | Care Plan is managed by the concurrent review team. | | |

| Opportunity | Action Taken to Address Identified Barriers to | |
|--------------------------|--|--|
| Оррогили | Improved Performance | |
| | In July/2011, a Provider Update, "Inpatient Notification | |
| | Requirements", was sent to ancillary providers, (Skilled | |
| | Nursing, Acute Rehab, Long-Term Facilities) educating | |
| | and reminding them of this contractual requirement. | |
| (FUH) F/U after Mental | MHN Service Team schedules aftercare appointments | |
| Health Hospitalization - | with member within 7 days of discharge | |
| 7 day | MHN Service team documents scheduled appointment | |
| | in D/C assessment in Unity to communicate to care | |
| | team | |
| | MHN Service Team or Case Manager calls member | |
| | within 5 days of discharge to remind and encourage | |
| | completion of F/U visit | |
| Implementation of | | |
| Individualized Care | | |
| Plan | | |
| Delegated Care Plan | The Delegation Oversight team established monthly | |
| Established | reporting requirements from delegated PPGs in the | |
| | fourth quarter of 2010, "Case Management Engagement | |
| | Reporting for Delegated PPGs". The report includes the | |
| | number of SNP members, acuity levels, and percent of | |
| | completed assessments and Care Plans to monitor and | |
| | enforce this metric. Four medical groups that did not | |

| Opportunity | Action Taken to Address Identified Barriers to | | |
|-----------------------|--|--|--|
| Оррогини | Improved Performance | | |
| | meet the requirements in 2010 were de-delegated for | | |
| | Dual Eligible SNP. | | |
| Implementation of | Action Taken | | |
| Individualized Care | | | |
| Plan | | | |
| Delegated File Review | The Delegation Oversight team provides education and | | |
| Compliance | support to the delegated groups on the SNP Model of | | |
| | Care requirements, including the documentation | | |
| | requirements for file review. In addition, the topic for | | |
| | the monthly SNP PPG Teleconference on 11/18/2009 | | |
| | attended by 44 participants was "Creating the Care | | |
| | Plan". | | |
| Care for Older Adults | Monthly educational teleconferences for the SNP | | |
| (COA) | delegated PPGs are conducted to educate PPGs of SNP | | |
| | requirements. On 1/27/2010 the topic for the SNP | | |
| | educational teleconference attended by 66 participants | | |
| | was "SNP HEDIS® Measures". The Vice President of | | |
| | HEDIS® Management educated PPGs on the specific | | |
| | Care for Older Adults (COA) measure and | | |
| | documentation requirements. | | |
| | In Jan 2011, Health Net began calling Medicare | | |

| Opportunity | Action Taken to Address Identified Barriers to | |
|-------------|---|--|
| Opportunity | Improved Performance | |
| | members to encourage annual physicals and assist | |
| | members to make appointments with their PCP which is | |
| | necessary to complete the components of this standard | |
| | (annual medication review, pain and functional assessment). | |
| | | |
| | The Dual Eligible SNP program also includes a | |
| | transportation benefit ranging from unlimited trips for | |
| | HNCA's largest Dual Eligible SNP to 20 one way trips for | |
| | the HNAZ Dual Eligible SNP to further promote annual | |
| | physical appointments. | |

11d. Documentation of the MOC Evaluation

The data elements collected correspond with the goals of the Dual Eligible SNP Model of Care and include data from HEDIS®, CAHPS, the HRA, utilization reports, appeals and grievance, surveys, delegation oversight, provider network, pharmacy services and MHN. Goals are set based on available benchmarks from NCQA, CMS or internal standards as applicable and are detailed in Table 2 under element 2b. Corrective action plans will be implemented as indicated for internal departments, external vendors or delegated medical groups for data elements that do not meet performance standards.

The 2010 Annual Dual Eligible SNP Evaluation is approved by members of the Dual Eligible SNP Governance Committee and retained as an official record according to Health Net's Record Retention policy. The complete document is 36 pages and includes quantifiable measures, quantitative and qualitative analysis, barrier and opportunity analysis, actions taken to address barriers and data definitions.

2010 Annual Evaluation Special Needs Plans **ACTIVITY SUMMARY**

Name/Title: Health Net Annual Evaluation of Special Needs Plans (SNP) Measurement Year 2010

Date: August 2011

Purpose of Activity
The purpose of this evaluation is to assess the performance of the Special Needs Plan (SNP) Model of Care by collecting and analyzing metrics from key Model of Care domains in order to quantify effectiveness and identify areas for improvement

Applicable Product Lines

Special Needs Plans

California:

Chronic Disease SNP, Health Net Seniority Plus Amber for CHF

Dual Eligible SNP, Health Net Seniority Plus Amber I

Dual Eligible SNP, Health Net Seniority Plus Amber II

Arizona:

Dual Eligible SNP, Health Net Amber

Quantifiable Measures

Key measures were identified in each of the following healthcare domains to measure effectiveness of the SNP Model of Care:

Health Outcomes and Use of Evidence Based Practices

Health Risk Assessment

Improvement in Member Health Status

Access to Care

Transitions of Care

Effectiveness of Communication Systems

Implementation of Individualized Care Plan

Specialized Provider Network

Delivery of Extra Services and Benefits

Implementation of the SNP Model of Care.

11e. Personnel with Oversight for Monitoring/Evaluating MOC Effectiveness

Ongoing and annual data is collected, analyzed and reported to the Dual Eligible SNP Governance Committee. Results of the data analysis and recommendations of the Dual Eligible SNP Governance Committee are considered in determining quality improvement activities, projects and specialized services and benefits. Electronic and print copies of the evaluation of the Dual Eligible SNP Model of Care will be prepared annually, reported to the Care Management Access and Clinical Quality Committee (CMACQC), and, as requested, to regulatory and accreditation organizations and preserved as an official record.

- The QI Director holds a Masters in Public Health and a Bachelor of Science in Nursing. She has had experience with the Dual Eligible SNP program since its inception at Health Net and provides resources and guidance for the QI Manager of the Dual Eligible SNP program.
- The Dual Eligible SNP Governance Committee represents management and leadership of key departments responsible for implementation of the Dual Eligible SNP Program per list below:

| Dual Eligible SNP Governance | |
|------------------------------|--|
| Committee | |
| VP Provider Network | |
| VP Medicare Programs | |

Dual Eligible SNP Governance Committee VP HEDIS® Management **VP Clinical Services VP Clinical Operations Supervisor Customer Service** Senior Writer Senior Research Analyst QI Specialist QI Manager SNP QI Manager Medicare **Project Manager Medical Director** Manager QI Research and Analysis Manager Provider Network Manager Program Relationships Manager Product Development Manager Health Care Analysis Manager Delegation Oversight Manager Compliance and Reporting Manager Compliance Manager Clinical Operations MHN Managers Case Management

| Dual Eligible SNP Governance | | |
|---------------------------------------|--|--|
| Committee | | |
| Director Dual Eligible SNP Case | | |
| Management | | |
| Director Quality Improvement | | |
| Director Pharmacy MTM | | |
| Director Membership Ops | | |
| Director Health Care Services | | |
| Director Disease Management | | |
| Director Delegation Oversight | | |
| Director Compliance | | |
| Clinical Supervisor MHN Dual Eligible | | |
| SNP | | |
| Chief Medical Director | | |

11f. Communication of Improvements to MOC to Stakeholders

Providers and members will be informed of outcomes through educational programs, updates, newsletters, and provider and member Web - portal online articles and postings. The Medicare Newsletter includes an annual article, "Health Net's Commitment to Quality" informing members of Health Net's progress towards goals for key HEDIS® and Customer Satisfaction metrics including improvement from the previous year and if the results are above the CMS National Average. An annual Online News article reports similar information to

providers according to product line. Provider Updates throughout the year inform providers of the outcomes of the quality improvement program and projects.

- Annual Teleconference with Dual Eligible SNP Provider Groups on program outcomes occurred on 5/25/11 and is scheduled for 7/25/2012. Outcomes from a variety of HEDIS®, CAHPS, access, Transitions of Care, Care Planning, IDCT, HRA metrics were presented followed by a discussion of how to improve results.
- Annual Online News article for providers includes key outcomes compared to previous year and national standards for multiple lines of business.
- Annual Dual Eligible SNP Program evaluation of the metrics included in Table 2 under Element 2b is reported to the Dual Eligible SNP Governance and CMACQC committees. In addition to the outcomes, the report includes a barrier analysis, opportunities and summary of interventions to address low performance.
- Annual Medicare newsletter informs members of Health Net's progress towards the goal of improving care and outcomes. The table below was included in the 2011 newsletter.

California

| Measures of clinical care | Improved from previous year | Above national average |
|--|-----------------------------|---------------------------|
| Flu vaccinations obtained | | 1 |
| Breast cancer screening | 1 | 1 |
| Osteoporosis management | 1 | 1 |
| Cholesterol less than 100 | 1 | 1 |
| Good control of high blood pressure | | 1 |
| Proper medication after a heart attack | 1 | 1 |
| Measures of service | | |
| Getting needed care | 1 | |
| Getting care quickly | 1 | • |
| Measures of health outcomes | | |
| Treatment of urinary leakage problems in older adults who have a problem | | |
| Managing risk of fall in older adults who have had a fall or have problems with balance or walking | • | • |
| Advising physical activity to older adult | | • |









MQR #7a - Attachment 5

7a. Sanctions and Penalties

Medi-Cal Programs

Health Net Community Solutions, Inc. ("Health Net") contracts with the California Department of Health Care Services ("DHCS") for the Two Plan Model and the Geographic Managed Care ("GMC") model for Medi-Cal enrollees in several counties, including Los Angeles under the Two Plan Model and San Diego under GMC. Health Net has been licensed by the California Department of Managed Health Care ("DMHC") as a full service health care service plan since 2005 and is a wholly owned subsidiary of Health Net of California, Inc. ("HNCA"), also a licensed full service health care service plan since 1991. A list of DMHC sanctions and penalties applicable to Health Net's Medi-Cal operations is set forth on pages 4-5 of this Attachment 5.

Medicare Programs

Health Net's parent, HNCA is contracted with CMS under the MA-PD program in twenty-one California counties and, for D-SNP enrollees, in several counties, including the past six years in Los Angeles County and four years in San Diego County. Another wholly owned subsidiary of HNCA, Health Net Life Insurance Company ("HNL") is contracted with CMS for the PDP program in California and other states.







in more detail below) are corrected.

In January 2010, Health Net was notified by CMS that, due to certain pharmacy claims processing errors, none of our stand-alone PDP plans would receive auto-assignment of Low Income Subsidy ("LIS") eligible Medicare beneficiaries under CMS' LIS auto-assignment process, effective February 1, 2010. In May 2010, CMS accepted a corrective action plan, which requires Health Net to report certain LIS-related metrics to CMS on a regular basis. On September 24, 2010, CMS notified Health Net that, based on CMS' LIS readiness assessment, CMS would not reassign any current LIS beneficiaries to HNL for the 2011 plan year, and that the January 2010 decision regarding LIS auto-assignment will remain in effect until the issues

identified in the January 2010 notification and CMS' August 2010 audit (described

In August 2010, CMS conducted an audit of Health Net's Medicare Advantage, Medicare Advantage Prescription Drug and stand-alone PDP plan operations, including the areas of membership accounting, premium billing, Part D formulary administration and appeals, grievances and coverage determinations, and the compliance program. Based on the results of the audit, effective November 20, 2010, CMS imposed sanctions suspending the marketing to and enrollment of new members into Health Net's Medicare Advantage, Medicare Advantage Prescription Drug and stand-alone PDP plans. These sanctions did not impact the enrollment status of existing Medicare enrollees and during the sanction period Health Net continued to provide benefits to and serve Medicare Advantage and stand-alone PDP members. CMS allowed Health Net to enroll existing members of group/employer plans into Health Net Medicare Advantage and PDP plans as they became eligible for Medicare products.









Ensuring that Health Net maintains compliance with federal, state and local regulatory provisions has always been a priority for the company; however, following the August 2010 CMS audit, it became clear that Medicare compliance efforts required enhancement. From the date of the CMS audit, Health Net has focused on instilling a culture of compliance throughout the organization - to make compliance part of each associate's every day work. Health Net implemented an integrated, process-driven approach that maps to regulatory requirements that is based on the seven elements of an effective compliance program across all lines of business, including Medicaid and commercial operations as well as Medicare.

On August 1, 2011, CMS lifted the sanctions, and Health Net resumed marketing Medicare Advantage and stand-alone PDP products and enrolling beneficiaries with effective dates on or after September 1, 2011. The freeze continues on HNL's stand-alone PDP products from receiving auto-assignment of LIS eligible Medicare beneficiaries under CMS' LIS auto-assignment process. However, LIS members can make their own choice to enroll in our products during the annual enrollment period, or in the month they become eligible for PDP coverage.









Sanctions and Penalties Taken by the **Department of Managed Health Care** for 2006-2010 (with review periods 2007-2011) for **Health Net Community Solutions, Inc., Medi-Cal Operations**

| | 2009 |
|--|-------------|
| Description of Investigation | Enforcement |
| | Penalty |
| Exceeded 30 day grievance | \$ 2,500 |
| Denial letter failed to include DMHC phone number, TDD phone | \$ 2,500 |
| number, etc. | |
| 2009 Total | \$ 5,000 |

| | 2011 |
|---|-------------|
| Description of Investigation | Enforcement |
| | Penalty |
| | |
| 2008 Routine Exam Claims & PDR -Routine Examination of Claims | \$500,000 |
| Settlement Practices and Provider Dispute Resolution - Final | |
| Report issued 10/12/09. A single penalty of \$500,000 was paid in | |
| relation to deficiencies identified from 2006, 2007 and 2008 | |
| Claims and PDR examinations, with \$250,000 pended subject to | |
| outcome of 2011 Claims and PDR Routine Examination. This fine | |









| | 2011 |
|---|-------------|
| Description of Investigation | Enforcement |
| | Penalty |
| applied to commercial and Medi-Cal deficiencies, but only the | |
| 2008 and 2011 Examinations included Medi-Cal Claims and PDRs. | |
| For Medi-Cal Claims, deficiencies were in timely forwarding of | |
| misdirected claims, accurate reimbursement, accurate entry of | |
| receipt date and clear explanation of claims determination. For | |
| Medi-Cal PDRs, deficiencies were errors in determination letters, | |
| inaccurate receipt date, delay in payment date, inaccurate | |
| written determination letters, handling of amended provider | |
| disputes, medical records handling and reprocessed PDRs. The | |
| Corrective Action Plans have all been completed. | |
| | |
| 2011 - Deficiency in timely resolution of PDRs pending. | |
| 2011 Total | \$500,000 |









MQR #8a – Attachment 6

8. **High Quality**

Health Net is compliant with the DHCS and CMS standards for a comprehensive Quality Improvement Program including NCQA SNP-specific performance requirements. Performance metrics for the Medi-Cal Managed Care program incorporate health outcomes, health assessments, access and satisfaction including appeals and grievances. The DHCS also requires quality improvement projects with clearly defined performance indicators. Performance metrics for the Medicare SNP program incorporate health outcomes, health risk assessment, access, satisfaction, transitions of care, communication systems, care planning, provider network, Model of Care and delivery of add-on services. CMS also requires annual quality improvement projects and a chronic care improvement program focusing on the management of chronic conditions.

Medi-Cal

The past three years of Healthcare Effectiveness Data and Information Set ("HEDIS") and Consumer Assessment of Healthcare Providers and Systems ("CAHPS") results for Medi-Cal are included in attachments 7, and 8. Health Net collects, tracks and reports Medi-Cal HEDIS (External Accountability Set) rates by county and in aggregate for NCQA accreditation. Annual CAHPS surveys for the Medi-Cal population are fielded and rates are tracked and reported in order to meet DHCS and NCQA standards. To ensure contracted providers are meeting DHCS accessibility requirements for Seniors and Persons with Disabilities, facility site reviews are conducted for primary care physicians, specialists and hospitals every 3 years as reported in attachment 9. The Quality Improvement ("QI")









Department develops and conducts 2 Quality Improvement Projects ("QIPs") meeting the DHCS requirements. The current QIPs consist of an individual QIP: Improving Cervical Cancer Screening For Aged and Disabled members selected by the health plan and a statewide QIP: Reducing Hospital Readmission rates selected by DHCS. In Los Angeles County, two HEDIS metrics: Appropriate Treatment of Children with Upper Respiratory Infections and Timely Postpartum Visit are below the minimum performance level. Corrective actions have been developed to focus on improving these metrics. Other rates have improved including immunization rates which continue to improve in Los Angeles County along with well child visits including adolescent visits.

Medicare

The past three years of HEDIS, the Medicare Health Outcomes Survey ("HOS") and two years of CAHPS results for SNP are included in attachments 10, 11 and 12 respectively. A supplemental table for HOS including the third year of Cohort 13 is in attachment 13. In 2010, Health Net began conducting a SNP specific CAHPS to improve the evaluation of SNP satisfaction and identify areas for improvement. The 2011 results were received in January and the full report will be completed in February of 2012. Attachment 12 is a preliminary snapshot comparing 2010 and 2011 with significance testing noting denominators of less than 100.

Overall, HEDIS results for D-SNPs have improved the past three years and exceed or equal the available SNP Mean provided by CMS in all but one, Pain Screening, a sub-measure of Care of Older Adults (COA). The two metrics with decrease in performance involve small denominators and should be viewed with caution, for example, Osteoporosis Management (denominator 60-83). The HOS outcomes



toolkits.





are a combination of SNP and MA members and improved in four of the seven measures. The 2010 SNP specific CAHPS results were overall in line with CMS National Medicare rates with lower rates in Getting Needed Care and Getting Care Quickly noted. Health Net implemented multiple quality improvement activities in 2011 to address HEDIS, HOS and CAHPS outcomes such as member outreach through phone and mail to encourage preventive screening, flu/pneumonia vaccine reminders, member and provider newsletters and articles, member educational calendars, provider teleconferences and educational

resources such as Improving Member Experience and Depression Management

CMS also requires annual Quality Improvement Projects ("QIPs") and a Chronic Care Improvement Program ("CCIP") for MA and SNP. Health Net conducts combined QIPs for the MA and SNP populations, to maximize efficient use of resources, and SNP specific QIPs. Current Health Net QIPs include: Improve HRA Completion Rates for SNP Members, Decrease Use of High-Risk Drugs in the Elderly, Improve Fall Risk Management and Improve Management of Urinary Incontinence. The QI Medicare team coordinates with multiple departments when performance through HEDIS, CAHPS, HOS or other metrics is below goals to analyze barriers, develop strategies and activities to improve outcomes and monitor data to evaluate QIP effectiveness.

Health Net's CCIP is administered as part of its Decision Power Program. Decision Power is a whole person approach to wellness and disease management that includes algorithms to identify members for outreach, a member portal with secure electronic health record, a comprehensive data base of evidence based educational materials on diseases and conditions, interactive programs for weight









management, increasing physical activity and tobacco cessation and 24 hour access to experienced Health Coaches with extensive training. The CCIP focuses on five chronic diseases common in the elderly: diabetes, coronary artery disease, chronic obstructive pulmonary disease, congestive heart failure, and hypertension. Members identified with these disorders receive educational materials and outreach from a Health Coach to assess educational needs, develop self-management skills and promote compliance with their physician's treatment plan. HEDIS metrics relevant to these disorders are utilized to evaluate program effectiveness.

Please see Dual Eligible Demonstration Project Narrative section 5 regarding access and availability standards.

Los Angeles County

ACTIVITY SUMMARY

TO:

QI CLINICAL AND SERVICE WORKGROUP

FROM: DATE: Manjula Patel, Sr. Research Analyst, QI Research & Analysis October 4, 2011 (Revised October 21, 2011) (Revised 2/17/12)

SUBJECT:

Reporting Year (RY) 2011 HNCA HEDIS® Medi-Cal Report - Los Angeles County

This report has been summarized for the Dual Eligible Demonstration Project submission. Data tables for counties other than Los Angeles have been removed. The Barrier Analysis section is included to provide examples of Quality Improvement activities.

Purpose of Activity

The purpose of this report is to present and evaluate the RY 2011 Health Net of California (HNCA) HEDIS® (Healthcare Effectiveness Data and Information Set) Medi-Cal rates based upon Health Net's performance in the measurement year (MY) 2010. Analysis of Health Net's performance allows for the identification of barriers and opportunities for improvement.

Quantifiable Measures

HEDIS® measures presented in this report are based on RY 2011 HEDIS® External Accountability Set (EAS) measures that are selected and required by the Department of Health Care Services (DHCS). These measures are to be reported by Health Plans contracted with Medi-Cal Managed Care Division (MMCD). The DHCS selected performance measures are used in the auto assignment and default algorithm, and are selected based on members' needs and program priorities. The Default Measures are six selected measures from the EAS measures that are evaluated in a 2 Plan contracted County. The health plan with a higher rate of these default measures will receive the contract for that county.

Tables detail the HEDIS® measures reported for HNCA Medi-Cal. These measures are categorized into the following domains:

- Effectiveness of Care
- Access/Availability of Care
- · Use of Services

Threshold(s) /Benchmark(s):

Medi-Cal HEDIS® results are compared to the Minimum Performance Level (MPL) and High Performance Level (HPL) as indicated by the DHCS MMCD. MPLs and HPLs for the RY2011 HEDIS scores are based on the RY2010 National Medicaid 25th and 90th percentiles found in NCQA's *Audit Means*, *Percentiles*, and *Ratios*.

The DHCS MPL is a critical reference value for HEDIS® metrics as performance below the MPL requires a Corrective Action Plan (CAP) which is issued to the health plan by DHCS. The NCQA Quality Compass (QC) RY 2010 National 50th and 75th percentiles are additionally included as reference values for comparison of RY 2011 HEDIS® rates.

A 'NA' is shown in the report tables where the DHCS-MPL, DHCS-HPL, NCQA 50th and 75th percentiles are unavailable.

Methodology/Sampling/Time Period

HEDIS® measures reported by Health Net were specified using one of the following data collection methodologies – administrative methodology or hybrid methodology. Data collection was conducted per HEDIS® Technical Specifications for RY 2011. RY 2011 rates are statistically tested against Health Net's RY 2010 results, where applicable, using a Chi-Square Test of Proportions, with an alpha of 0.05.

Administrative Methodology

Identification of denominators and numerators are made using transaction data or other Health Net administrative databases. The denominators consist of the total eligible population as determined by continuous enrollment, age, inclusion criteria, and contraindications. The numerators are identified within Health Net's administrative systems and consist of members within the denominator who were identified as having a qualifying procedure or diagnosis.

Hybrid Methodology

Identification of numerator compliance is conducted through administrative and medical record data extraction. The denominator consists of a systematic sample of members drawn from the measure's eligible population. Health Net reports a rate based on members in the sample who are found through either administrative or medical record data to have received the service required for the numerator.

Non-Trendable Measures

The following measures are considered non-trendable between the specified consecutive years during 2009-2011 due to HEDIS® related factors including technical specification changes and introduction of new metrics:

2011 vs. 2010

None

2010 vs. 2009

Use of Appropriate Medications for People with Asthma

• Lowered upper age limit from 56 to 50 years of age. Modified age stratifications to '5-11' years, '12-50' years and 'Total'. 'Total' is still trendable.

Childhood Immunizations Status

- Added hepatitis A, rotavirus, and influenza vaccines
- Added Combinations 4 through 10

Comprehensive Diabetes Care

- Newly reported measure HbA1c Adequate Control (<8.0%)
- Newly reported measure Blood Pressure Controlled 130/80
- Newly reported measure Blood Pressure Controlled 140/90

Lead Screening in Children

Newly reported measure

Pharmacotherapy Management of COPD Exacerbation

Newly reported metric

Weight Assessment & Counseling for Children/Adolescents

Newly reported metric

Results

The RY 2011 HEDIS® Medi-Cal and prior year results for metrics (Accreditation and County Specific) are presented in Tables 1 and 2. Primary interventions in 2010 associated with HEDIS® metrics are presented in the tables.

Table 1. Summary of HEDIS® Measures - Medi-Cal RY 2009-2011, 2011 Reference Standards: EAS Accreditation Metrics

| Measure | 2010 Program/ Intervention | HN RY 2009 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | DHCS MPL (%) | DHCS HPL (%) | QC National 50th Percentile | QC National 75th Percentile |
|---|---|----------------------|----------------------|---|---|--------------------|--------------------|--------------------------------------|--------------------------------------|
| Effectiveness of Care | | | | G G G G G G G G G G G G G G G G G G G | | | | | |
| Childhood Immunizations ^H | CAIR Statewide | | | 52 (535) 22 (537) 23 (527) 25 (527) 27 (537) 27 (537) 27 (537) | | | | | |
| Combo 3 ^D | Registry | 76.16 | 73.32 | 75.93 | 2.61 | 63.50 | 82.00▲ | 71.05 | 76.54▲ |
| Weight Assessment & Counseling for Children/Adolescents H | Eit Eamilies for | | | | | | | | |
| BMI Screening - Total | Life - Coaching | N/A | N. R. | 63.46 | N/A | 13.00 | 63.00 | 29.20 | 45.24 |
| Counseling on Nutrition - Total | Frogram | N/A | NR | 70.43 | N/A | 34.30 | 67.90 | 46.23 | 57.18 |
| Counseling on Physical Activity - Total | P1W11 BU | N/A | NR | 50.96 | N/A | 22.90 | 56.70 | 35.04 | 45.03 |
| Breast Cancer Screening - Total | HEDIS Outreach | 48.48 | 51.23 | 49.54₩ | -1.69 | 46.20 | €3.80▲ | 51.88▲ | 59.54▲ |
| Cervical Cancer Screening ^{H D} | CCS Reminder Calls HEDIS Outreach | 71.27 | 73.53 | 22.69 | -3.76 | 61.00 | 78.90 ▲ | N/A | N/A |
| Appropriate Treatment, Children w/ URI | AWARE HEDIS Outreach | 81.29 | 84.47 | 83,10 ↓ | -1.37 | 82.10 | 94.90▼ | 85.78▲ | 90.65▲ |
| Avoidance of Antibiotic Tx in Adults w/ Acute Bronchitis | AWARE HEDIS Outreach | 28.60 | 29.34 | 21.48↓ | -7.86 | 19.70 | 35.90▲ | 23.56▲ | 27.00 |
| Comprehensive Diabetes Care H | | | | | | | | | |
| HbA1c Testing R11D | Diabetes – Be in Charne ISM | 84.56 | 86.24 | 86.24 | N/A | 76.00 | 90.20▲ | 81.10 | 86.43▲ |
| HbA1c Poor Control (>9.0%)* R11 | Disease | 40.31 | 38.76 | 38,76 | N/A | 53.4 | 27.7▲ | 43.07 | 33.69▲ |
| HbA1c Adequate Control (<8.0%) R11 | Management Program | NR | 50.46 | 50.46 | N/A | 38.70 | \$8.80 | 46.63 | 54.37▲ |
| Diabetic Retinal Exam R11 | | 63.46 | 63.07 | 63.07 | N/A | 41.40 | 70.10▲ | 54.01 | €3.69. |
| LDL-C Screening AR11 | IAMCHAD | 79.76 | 80.73 | 80.73 | N/A | 69.30 | 84.00₽ | 75.36 | 80.15 |
| LDL-C Control (<100 mg/dL) R11 | | 36.54 | 36.24 | 36.24 | N/A | 27.20 | 45.50▲ | 33.76 | 40.92▲ |

Table 1 (Contd). Summary of HEDIS[®] Measures - Medi-Cal RY 2009-2011, 2011 Reference Standards: EAS Accreditation Metrics

| | | 212/212/212/212/212/212/212/212/212/212 | NINCOLOGICAL STREET, S | Programme Contraction | H. M. C. | CHARLES CONTRACTOR | Programme Company | WITH TAY THE BUILDING AND A CONTROL | |
|--|--|---|--|-----------------------|--|--|-------------------|---|--|
| | ZULU Program/ | 2 | 2 | 2 | Change | <u> </u> | 16 G | 8 | ဝွ |
| | Intervention | 2009 | 2010 | 2011 2011 | RY 2010 to | OPC JAP | 3 I 1 I | National 50th | National 75th |
| Measure | | (%) | (%) | (%) | RY 2011 (%) | (%) | [%] | Percentile | Percentile |
| Medical Attention for Nephropathy | Diabetes – Be in Charge I SM | 82.16 | 82.11 | 84.12 | 2.01 | 72.50 | 86.20▲ | 77.78 | 82.73 |
| Blood Pressure Controlled 140/80 | Disease Management | N/A | N/A | NR | N/A | N/A | N/A | N/A | N/A |
| Blood Pressure Controlled 140/90 | I AM CHAD | N R | 62.61 | 64.65 | 2.04 | 53.50 | 73.40▲ | 61.43 | 68.49▲ |
| Use of Imaging Studies for Low Back Pain | | 81.59 | 79.81 | 79.92 | 0.11 | 72.00 | 84.10▲ | 76.28 | 79.84 |
| Access/Availability of Care | | | | 1000 A | 100 100 100 100 100 100 100 100 100 100 | 100 100 100 100 100 100 100 100 100 100 | 2000 V | 27134 2713 2713 2713 2713 2713 2713 2713 2713 | 200 200 200 200 200 200 200 200 200 200 |
| Prenatal and Postpartum Care H | IVR/Customer | | 646) 6484 6484 6484 | 100 | 10 10 10 10 10 10 10 10 10 10 10 10 10 1 | | | | |
| Timeliness of Prenatal Care ^D | Service Call | 84.86 | 88.24 | 90.02 | 1.78 | 80.30 | 92.70▼ | 85.92 | 89.89 |
| Postpartum Care | HEDIS Outreach Pregnancy Packets | 57.80 | 61.54 | 62.95 | 1.41 | 58.70 | 74.40▶ | 65.44▲ | 70.29▲ |
| Use of Services | | | | | | Table City | | | |
| Well-Child Visits H | | | 2KG 19857431 | | | | | | |
| Visits in the 3rd, 4th, 5th, 6th Years D | HEDIS Outreach | 78.05 | 77.44 | 79.81 | 2.37 | 65.90 | 82.50▲ | N/A | N/A |
| | AWC Reminder Calls | | | | | | | | |
| Adolescent Weil-Care Visits HD | AWC Initiative | 39.44 | 40.14 | 45.93 | 5.79 | 38.80 | 63.20▲ | A/A | ĕ/N |
| | HEDIS Outreach | | | | | | | | |
| | | | | | | | | | |

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Table 2. Summary of HEDIS® Measures (EAS) – Medi-Cal RY 2009-2011,2011 Reference Standards: Los Angeles County

| Weasure | 2010 Program/ | HN RY 2009 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | DHCS MPL (%) | DHCS | QC National 50th Percentile | QC National 75th Percentile |
|---|--|---|----------------------|----------------------|---|--------------------|--|--------------------------------------|--|
| Effectiveness of Care | | 71.05 2.03 2.03 2.03 2.03 2.03 2.03 2.03 2.03 | | | | | | | |
| Childhood Immunizations ^H | CAIR | | | | | ESEC | 11 C.S. 11 E S. 12 C.S. 12 C.S. 12 C.S. | | |
| Combo 3 ^D | Statewide Registry | 77.22 | 73.09 | 77.10 | 4.01 | 63.50 | 82.00▲ | 71.05 | 76.54 |
| Weight Assessment & Counseling for Children/Adolescents H | Fit Families for | CLI CLI CLI CLI CLI CLI CLI CLI CLI CLI CLI CLI CLI CLI CLI CLI | | | | | G. 1.0 70.28 90.00 | | |
| BMI Screening - Total | Life – Coaching Program | N/A | 62.56 | 63.61 | 1.05 | 13.00 | 63.00 | 29.20 | 45.24 |
| Counseling on Nutrition - Total | PM160 | N/A | 73.26 | 71.33 | -1.93 | 34.30 | 67.90 | 46.23 | 57.18 |
| Counseling on Physical Activity - Total | | N/A | 46.74 | 53.73♠ | 6.99 | 22.90 | 56.70▲ | 35.04 | 45.03 |
| Breast Cancer Screening - Total ^A | HEDIS Outreach | 49.20 | 52.31 | 1 0,03√ | -2.22 | 46.20 | 63.80▲ | 51.88▲ | 59.54 A |
| Cervical Cancer Screening HAD | CCS Reminder Calls HEDIS Outreach | 73.17 | 75.44 | 69.50 | -5.94 | 61.00 | 78.90▶ | N/A | N/A |
| Appropriate Treatment, Children w/ URI ^A | AWARE HEDIS Outreach | 80.27 | 83.75 | 81.32V MPL | -2.43 | 82.10▲ | 94.90 ▶ | 85.78▲ | 90.65▲ |
| Avoidance of Antibiotic Tx in Adults w/ Acute Bronchitis ^A | AWARE HEDIS Outreach | 29.17 | 30.97 | 20.18少 | -10.79 | 19.70 | 35.90▲ | 23.56▲ | 27.00 |
| Comprehensive Diabetes Care H | | | | | | | | | TO THE STATE OF TH |
| HbA1c Testing ^{A D} | Diabetes – Be | 84.67 | 86.84 | 84.03 | -2.81 | 76.00 | 90.20▲ | 81.10 | 86.43▲ |
| HbA1c Poor Control (>9.0%)* A | in Charge I SM | N/A | 39 | 40.74 | 1.74 | 53.4 | 27.7▲ | 43.07 | 37.69▲ |
| HbA1c Adequate Control (<8.0%) | Management | NR | 50.24 | 46.30 | -3.94 | 38.70 | 58.80▲ | 46.63▲ | 54.37▲ |
| Diabetic Retinal Exam ^A | Program | 64.40 | 64.59 | 55.32₩ | -9.27 | 41.40 | 70.10▲ | 54.01 | €3.69▲ |
| LDL-C Screening A | I AM CHAD | 80.24 | 81.58 | 80,79 | -0.79 | 69.30 | 84.00₽ | 75.36 | 80.15 |
| LDL-C Control (<100 mg/dL) | | 36.46 | 36.36 | 37.27 | 0.91 | 27.20 | 45.50▶ | 33.76 | 40.95▲ |

2/17/2012

| QC National 75th Percentile | 82.73 | N/A | 68.49▲ | 79.84 | TALL STREET | Egg. | \$9.89 | 70.29▲ | | | N/A | A/A |
|---|--|----------------------------------|----------------------------------|--|--|--|--|---|--------------------------------------|---|--|--|
| QC National 50th Percentile | 77.78 | N/A | 61.43 | 76.28 | | | 85.92 | 65.44▲ | | | N/A | A/A |
| DHCS HPL (%) | 86.20 | A/A | 73.40▲ | 84.10▲ | 120 C | | 92.70▼ | 74.40▶ | | | 82.50▲ | 63.20▶ |
| (%) DHCS MPL | 72.50 | W/A | 53.50 | 72.00 | | | 80.30 | 58.70▲ | 2000 2000 2000 2000 2000 | | 65.90 | 38.80 |
| Change from RY 2010 to RY 2011 (%) | 4.51 | N/A | 2.17 | 2.21 | AND A | | 1.22 | 0.07 | | | 1.95 | 6.07 |
| HN RY 2011 (%) | 86.57 | NR | 63:89 | 80.02 | | | 86.57 | 58.21 MPL | | | 79.10 | 46.21 |
| HN RY 2010 (%) | 82.06 | N/A | 61.72 | 77.81 | STATE OF THE PARTY | INPINS IN | 85.35 | 58.14 | | | 77.15 | 40.14 |
| HN RY 2009 (%) | 82.45 | N/A | NR | N/A | | | 82.98 | 56.18 | | 00 to 10 to | 78.63 | 38.43 |
| 2010 Program/ Intervention | Diabetes – Be in Charge I SM | Disease Management Drogga | I AM CHAD | | | IVR/Customer | Service Call | HEDIS Outreach Pregnancy Packets | | | HEDIS Outreach | AWC Reminder Calls AWC Initiative RFQP CHDP HEDIS Outreach |
| Weasure | Medical Attention for Nephropathy ^A | Blood Pressure Controlled 140/80 | Blood Pressure Controlled 140/90 | Use of Imaging Studies for Low Back Pain | Access/Availability of Care | Prenatal and Postpartum Care HA | Timeliness of Prenatal Care ^D | Postpartum Care | Use of Services | Well-Child Visits HD | Visits in the 3rd, 4th, 5th, 6th Years | Adolescent Well-Care Visits ^{H D} |

Barrier Analysis

By understanding the barriers that affect quality, Health Net can identify methods to overcome those barriers and create interventions to improve quality. Table 3 summarizes performance barriers and quality activities/initiatives for metrics for key HEDIS measures.

Table 3 – Barriers for HEDIS® Metrics Associated with 2010-2011 Core QI Initiatives

| Measure(s) | Initiative | Barrier |
|---|---|---|
| Adolescent Well-Care (AWC) Visits | HEDIS® Outreach (includes face to face discussion/education with providers) | Adolescents are more often healthy and parents/adolescents feel that they do not need to see a provider yearly. |
| | AWC Initiative | Adolescents are a tough group to reach by phone and mail in addition to inaccurate phone and mailing addresses. |
| | RFQP CHDP Submission | Adolescents more often do not want to see their physicians with their parents. |
| | | Physicians have limited resources to conduct member outreach. |
| Appropriate Treatment for | AWARE Initiative (Alliance Working for Antibiotic Resistance) | Providers and members may not be aware of the most current CPG for URI. |
| Children with URI | | Providers have limited funds to produce educational materials for members. |
| | | PCPs may not be aware that other providers are |
| | | prescribing antibiotics inappropriately to their patients Members are accustomed to receiving antibiotics for LDI |
| | | Providers feel pressured by members to write a |
| | | prescription. |
| Avoidance of Antibiotic | AWARE | Members believe that antibiotics are needed to cure bronchitis. |
| Treatment in Adults with | | Physicians have limited time and resources to educate members about appropriate antibiotic use |
| Acute | | Providers may not be aware of the most current clinical |
| Bronchitis | | practice guideline for treating bronchitis. |
| | | Providers feel pressured by members to write a |
| | | prescription. |
| Breast Cancer | Breast Cancer Screening IVR Call to Members | Members do not believe that BCS is important |
| Screening | | Physicians have limited resources to conduct outreach to members for mammograms |
| | | Herrocio ioi manniogianio |

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| Barrier | Members were confused of conflicting BCS recommendations from USPSTF and ACS Referral process is cumbersome Providers more often do not know who among their members are due for mammograms. | Ď. | Si | Members are not aware that early detection through Pap testing results in better chance for recovery. Members think that Pap testing is complicated and too uncomfortable a procedure. Members think that since they are not sexually active, Pap testing may not be needed Providers may not be aware that SPDs need Pap testing. Providers may not perform Pap testing to SPDs since it is time consuming and some takes up more staff resources Providers may not be aware that preventive screening rates are lower for members with disabilities. | Ĺ, |
|------------|--|---|---|---|---|
| Initiative | | HEDIS® Outreach In 2011, revised and translated well woman pad in English, Spanish, Vietnamese, Hmong and Chinese. | PPG Mailing of Kern BCS Numerator Negatives | Cervical Cancer Screening IVR Call to Members | Member Newsletters Provider Updates/Online News Revised Well Woman Pad translated in Spanish, Hmong, Chinese and Vietnamese population, CCS SPD Provider Mailings |
| Measure(s) | | | | Cervical Cancer Screening | · |

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| Barrier | Member deficit about proper clinical care for specific conditions. | Lack of member screening. Provider may have a deficit of guidelines or may not be provider to the provider of the pr | aware of this educational resources. Lack of provider time during visit. Difficulty in identifying members with a particular disease for | a timely intervention.Non adherence/compliance with prescribed pharmaceuticals (for measures with a Rx therapy). | Change in Medi-Cal vision care benefit may have created confusion with both members and providers | | | | |
|------------|--|--|--|---|---|------------------|---|--|---|
| | | | | | | | | | |
| Initiative | Diabetes – Be in Charge i sm Disease Management Program. | LAM CHAD (Improving Adherence to Medication | for Cholesterol, Hypertension, Asthma and Diabetes): Pharmacy intervention. | Provider letters with list of their patients due for diabetic retinal eye exam with diabetic flow sheet. | Eligibility Unit calls DRE numerator negative members to set up appointments. | Provider Update. | Vision Services will send letters to all diabetic members reminding them to have an annual DRE. | Provider Update published the Updated Diabetes and Cardiovascular Reference Guide (PRG) collaboratively developed with the CMA Foundation and announced free Diabetes webinar. | McKesson DM program had refresher training with their DM nurses emphasizing the CDC HEDIS measures, had added in their preenrollment message the importance of DRE, the care plan assessment form had placed the CDC measures on the top of the list, and HbA1c and LDL management will be emphasized in communicating with member's providers. |
| Measure(s) | Comprehensive Diabetes Care | | | | | | | | |

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| Measure(s) | Initiative | Barrier |
|--------------------|-------------------------------|---|
| Prenatal and | HEDIS® Outreach | Members may feel well after the delivery and may not feel |
| Postpartum | : | that a follow-up is needed |
| Care | Text4baby (Postpartum Care | Members may have multiple pregnancies and deliveries |
| | | and feel that they know how to tale care of self and baby |
| | IVR/Customer Service Call | Mothers lack knowledge of the importance of follow-up for |
| | | self and baby |
| | | Mothers who had C-sections often have follow-up |
| | Pregnancy Matter Packets | appointments two weeks after delivery and do not have |
| 10/-: | \ [| rollow-up arter that visit |
| vveignt | TIL PAIMILIES TOT LIFE (PPPL) | Very low response rate to satisfaction/evaluation survey |
| Assessment | | even though members are incentivized with a monthly gift |
| and Counseling | | card drawing. |
| for Nutrition | | FFFL Coaching program had increased participation and |
| and Physical | | interest, but the continuation rate of members to stick with |
| Activity for | | the outbound coaching program has not shown much |
| Adolescents. | | improvement due to the inability to reach members due to |
| | - | phones being disconnected, or leaving voice mails. |
| | | The other challenge to the program is that all outcomes are |
| | | self reported. Since it is a telephonic coaching program, |
| | | there is no way to validate that the member improved their |
| | | behaviors or lost weight. |
| Well-Child | HEDIS® Outreach | Wait times for appointments may be long. |
| Visits in the 3'', | | Lack of continuity with a clinician or institution. |
| 4", 5" and 6" | | Physicians have limited resources to conduct member |
| rears or Life | | outreach. |
| | | Race, language and gender barriers. |
| | | |

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| DEMOGRAPHIC INFORMATION | |
|--|---|
| Plan Name: Health Net of California | |
| Study Leader Name: Rosario J. Richards Ti | tle: Senior QI Specialist |
| Telephone Number: 818-676-7288 E-Mail Add | dress: rosario.j.richards@healthnet.com |
| Name of Project/Study: Improve Cervical Cancer Screening among Female Med | i-Cal Seniors and Persons with Disabilities |
| Type of Study: ⊠ Clinical □ Non clinical ☑ HEDIS ☑ IQIP □ SGC □ Statewide Collaborative | Section to be completed by HSAG Year 1 Validation Initial Submission Resubmission Year 2 Validation Initial Submission Resubmission Year 3 Validation Initial Submission Resubmission |
| Date of Study: HEDIS® RY 2010 to HEDIS® RY 2012 | |
| Type of Delivery System: MCP | |
| Number of Medi-Cal Members in Plan Number of Medi-Cal Members in Study 731,741 9,293 | Baseline Assessment Remeasurement 2 Remeasurement 1 Remeasurement 3 |
| Type of Submission: ☐ Proposal ☒ Annual Submission ☐ Resubmission Submission Date: August 31, 2011 | Year 1 validated through Step Year 2 validated through Step Year 3 validated through Step |

A. Activity I: Choose the study topic. QIP topics should target improvement in relevant areas of services and reflect the population in terms of demographic characteristics, prevalence of disease, and the potential consequences (risks) of disease. Topics may be derived from utilization data (ICD-9 or CPT coding data related to diagnoses and procedures; NDC codes for medications; HCPCS codes for medications, medical supplies, and medical equipment; adverse events; admissions; readmissions; etc.); grievances and appeals data; survey data; provider access or appointment availability data; member characteristics data such as race/ethnicity/language; other fee-for-service data; or local or national data related to Medicaid risk populations. The goal of the project should be to improve processes and outcomes of health care or services in order to have a potentially significant impact on member health, functional status, or satisfaction. The topic may be specified by the state Medicaid agency or CMS, or it may be based on input from members. Over time, topics must cover a broad spectrum of key aspects of member care and services, including clinical and nonclinical areas, and should include all enrolled populations (i.e., certain subsets of members should not be consistently excluded from studies).

Study topic:

Improve Cervical Cancer Screening (CCS) among Seniors and Persons with Disabilities (SPD) in the female Medi-Cal population from 21 through 64 years of age

This study topic was selected based on the result of the Health Net 'All County' SPD CCS HEDIS® RY 2009 preliminary analysis showing that the RY 2009 CCS administrative rate among Health Net's contracted 'All County' Medi-Cal SPDs was 14% lower than the 'All County' Medi-Cal non-SPD population rate (48.9% vs. 62.9%) and the HEDIS® RY2009 CCS administrative rate among SPDs was 7.6% lower than the HEDIS® RY2009 MPL of 56.5%. In addition, the CCS rates were much lower when compared to the non-SPD population within each of the seven Medi-Cal counties. According to the National Health Interview Survey, women with disabilities are 15% less likely to have visited an OB/GYN in the past year and most importantly, when women with disabilities visit an OB/GYN, they are 20% less likely to receive a Pap smear than women without disabilities who visit an OB/GYN.

The Urban Institute research of Record has shown that one in every six persons on Medicaid can be classified as a "younger person with disability"—that is, a child or an adult under age 65 who qualifies for Medicaid coverage in part because of a disability. As of 2005, almost 22% of the U.S. population suffered from at least one disability, and this proportion is increasing. Furthermore, functional impairment is overrepresented in the poor, aged, and minority groups. Consequently, it is important that Medi-Cal managed care plans like Health Net attend to the health care needs of their disabled members. One of the most pressing concerns is the underutilization of preventive care. Research shows that a lower percentage of adults with a disability receive certain cancer screenings compared to the general population.

This disparity is particularly striking considering the frequency that seniors and persons with disabilities (SPDs) see a health care provider. Multiple studies have shown that

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¹ Drew, J. 2002. Differentials in Access to Cervical Cancer Screening For Women with Disabilities in the US. Results from Health Interview Surveys. www.allacademic.com/meta/p182513 index.html -

² D. Liska, B. Bruen, A. Salganicoff, P. Long, and B. Kessler. *Medicaid Expenditures and Beneficiaries: National and State Profiles and Trends, 1990-1995.* 3rd ed. Kaiser Commission on the Future of Medicaid, 1997.

³ Centers for Disease Control and Prevention. (2009). Prevalence and most common causes of disability among adults: United States, 2005. MMWR, 58(16), 421-426.

Wei, W., Findlay, P. A., & Sambamoorthi, U. (2006). Disability and receipt of clinical preventive services among women. Women's Health Issues, 16(6), 289-296.

⁵ Young, N. L., Steele, C., Fehlings, D., Jutai, J., Olmsted, N., & Williams, J. I. (2005). Use of healthcare among adults with chronic and complex disabilities of childhood. *Disability and Rehabilitation*, 27(23), 1455-1460.

A. Activity I: Choose the study topic. QIP topics should target improvement in relevant areas of services and reflect the population in terms of demographic characteristics, prevalence of disease, and the potential consequences (risks) of disease. Topics may be derived from utilization data (ICD-9 or CPT coding data related to diagnoses and procedures; NDC codes for medications; HCPCS codes for medications, medical supplies, and medical equipment; adverse events; admissions; readmissions; etc.); grievances and appeals data; survey data; provider access or appointment availability data; member characteristics data such as race/ethnicity/language; other fee-for-service data; or local or national data related to Medicaid risk populations. The goal of the project should be to improve processes and outcomes of health care or services in order to have a potentially significant impact on member health, functional status, or satisfaction. The topic may be specified by the state Medicaid agency or CMS, or it may be based on input from members. Over time, topics must cover a broad spectrum of key aspects of member care and services, including clinical and nonclinical areas, and should include all enrolled populations (i.e., certain subsets of members should not be consistently excluded from studies).

SPDs average roughly one doctor visit per month, yet only a small minority (less than one-quarter in one study) has a primary care physician (PCP).^{5,6} Providing primary and preventive care can not only improve quality of life and member satisfaction but also lower spending. This is critical considering that although SPDs comprise less than 20% of all Medicaid beneficiaries, they account for over 40% of program costs.⁷ The need to prevent and manage chronic conditions in Medi-Cal members with disabilities is paramount.

Based on these findings, Health Net aims to increase cervical cancer screening among Medi-Cal women with disability over 21 years of age.

The literature suggests that having members initiate dialogue about preventive screenings can potentially increase usage. Similarly, increasing access to necessary screenings has the potential to prevent or reduce the impact of diseases that, if undetected, could negatively impact member health and raise costs. These interventions have high potential to improve health outcomes, increase member satisfaction, and enhance care capacity for a portion of Health Net's Medi-Cal population.

Comparison of SPD and non-SPD Health Net Medi-Cal members in the pre-baseline and baseline analysis showed that CCS rates were much lower among the SPD population within each of the seven Health Net contracted Medi-Cal counties (Table 1 and Table 2). Statistically significant differences were seen within all seven counties and in the 'All Counties' rate. These results indicate the need to focus interventions aimed at increasing CCS rates within the SPD population at each county.

Note: 'All county' SPD includes all Health Net contracted counties (Fresno, Kern, Los Angeles, Sacramento, San Diego, Stanislaus and Tulare) in Measurement Years (MY) 2009, and 2010. Starting MY 2011 (Remeasurement 2), Fresno County will not be included in the interventions, analysis, and report. Fresno, Madera and Kings Counties contracted with CalViva Health effective March 1, 2011. As a result of the CalViva Health Medi-Cal contract with DHCS, Remeasurement 2 report for Health Net will only include Kern, Los Angeles, Sacramento, San Diego, Stanislaus, and Tulare counties. Fresno County will not be included in the Remeasurement 2 report.

Tables 1 and 2 below show the comparison of the CCS results between SPDs and non-SPDs in each of the seven Health Net contracted counties during the Prebaseline and Baseline periods

Table 1. Pre-Baseline Results: Study Indicator 1 (%) SPD vs. Non-SPD by County: January 1 through November 30, 2009

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⁶ Trupin, L., & Rice, D. P. (1998). Health status, medical care use, and number of disabling conditions in the United States. *Disability Statistics Abstracts*, 9, 1-4.

⁷ Truffer, C. J., Klemm, J. D., Hoffman, E. D., & Wolfe, C. J. (2008). 2008 actuarial report on the financial outlook of Medicaid. Washington, DC: Department of Health and Human Services.

A. Activity I: Choose the study topic. QIP topics should target improvement in relevant areas of services and reflect the population in terms of demographic characteristics, prevalence of disease, and the potential consequences (risks) of disease. Topics may be derived from utilization data (ICD-9 or CPT coding data related to diagnoses and procedures; NDC codes for medications; HCPCS codes for medications, medical supplies, and medical equipment; adverse events; admissions; readmissions; etc.); grievances and appeals data; survey data; provider access or appointment availability data; member characteristics data such as race/ethnicity/language; other fee-for-service data; or local or national data related to Medicaid risk populations. The goal of the project should be to improve processes and outcomes of health care or services in order to have a potentially significant impact on member health, functional status, or satisfaction. The topic may be specified by the state Medicaid agency or CMS, or it may be based on input from members. Over time, topics must cover a broad spectrum of key aspects of member care and services, including clinical and nonclinical areas, and should include all enrolled populations (i.e., certain subsets of members should not be consistently excluded from studies).

| | SPD | | Non-SPD | |
|---------------|------|------|---------|------|
| County | N | % | N | % |
| Fresno* | 483 | 33.7 | 6103 | 51.8 |
| Kern* | 681 | 32.0 | 2832 | 42.8 |
| Los Angeles* | 5006 | 40.4 | 50,995 | 45.1 |
| Sacramento* | 614 | 30.6 | 4571 | 43.1 |
| San Diego* | 334 | 31.4 | 3857 | 37.4 |
| Stanislaus* | 257 | 38.9 | 1753 | 51.8 |
| Tulare* | 152 | 35.5 | 2154 | 56.5 |
| All Counties* | 7527 | 37.9 | 72,265 | 45.5 |

^{*} Statistically significant difference (p-value ≤0.05) between SPD/non-SPD populations

Table 2. Baseline Results: Study Indicator 1 (%) SPD vs. Non-SPD by County: January 1, 2009 through December 31, 2009

| | SPD | | Non-SPD | |
|---------------|-------|------|---------|------|
| County | N | % | N | % |
| Fresno* | 490 | 40.2 | 5,367 | 62.1 |
| Kern* | 711 | 40.9 | 2,571 | 55.3 |
| Los Angeles* | 5,320 | 50.8 | 43,311 | 62.1 |
| Sacramento* | 647 | 39.6 | 3,883 | 60.5 |
| San Diego* | 378 | 42.1 | 3,039 | 54.0 |
| Stanislaus* | 275 | 44.7 | 1,700 | 60.1 |
| Tulare* | 160 | 40.6 | 1,982 | 66.1 |
| All Counties* | 7,981 | 47.5 | 61,853 | 61.4 |

^{*} Statistically significant difference (p-value <0.05) between SPD/non-SPD populations

B. Activity II: Define the study question(s). Stating the question(s) helps maintain the focus of the QIP and sets the framework for data collection, analysis, and interpretation.

Study question:

Do targeted member, provider and health plan interventions increase CCS rates among women age 21 to 64 years old in the eligible Medi-Cal population who are categorized as Seniors and Persons with Disability (SPD)?

An Eligible Study Member is defined as a Medi-Cal member who was included in the eligible population for the CCS HEDIS[®] measure based on 2011 HEDIS [®] Technical Specifications, Volume 2 and are defined as part of the SPD population as defined in Activity IV.

Note: For Pre-Baseline and Baseline the member eligibility specification were based on the 2010 HEDIS® Technical Specifications. For Remeasurement 2, the member eligibility specification will be based on the 2012 HEDIS® Technical Specifications.

C. Activity III: Select the study indicator(s). A study indicator is a quantitative or qualitative characteristic or variable that reflects a discrete event (e.g., an older adult has not received an influenza vaccination in the last 12 months) or a status (e.g., a member's blood pressure is/is not below a specified level) that is to be measured. The selected indicators should track performance or improvement over time. The indicators should be objective, clearly and unambiguously defined, and based on current clinical knowledge or health services research.

Study indicators:

Study Indicator 1 is a HEDIS® metric, 'Cervical Cancer Screening (CCS)'. It determines the percentage of women 21-64 years of age who received one or more Pap tests to screen for cervical cancer during the measurement year or the two years prior to the measurement year. The denominator population for the metric in this QIP includes all eligible Medi-Cal women 24-64 years of age as of December 31 of the measurement year who are in the SPD population. Calculation of who received one or more Pap tests to screen for cervical cancer during the measurement year or the two years prior to the measurement year among this population is found through administrative data. The eligible population is defined in Activity III and Activity IV. The most current reported measurement in Activity IX is based on the 2011 HEDIS® Technical Specifications, Volume 2.

This study topic was selected based on the Health Net All County SPD cervical cancer screening HEDIS® RY2009 result that showed 'All County' CCS administrative rate among Medi-Cal SPDs was 14% lower than the 'All County' non-SPD Medi-Cal administrative rate (48.9% vs. 62.9%). This finding was confirmed both in the Pre-baseline HEDIS®-like RY 2010 preliminary results (January 1 2009 through November 30, 2009) and the Baseline HEDIS® RY 2010 results. Statistically significant differences were seen within all seven counties and in the 'All Counties' rate as shown in Tables 1 and 2 above. The HEDIS®-like RY2010 (pre-baseline) CCS administrative "all counties" rate among SPDs (37.9%) was 7.6% lower than the non-SPD population rate (45.5%) and the baseline HEDIS® RY 2010 CCS administrative "all counties" rate among SPDs (47.5%) was 13.9% lower than the non-SPD rate (61.4%). These results indicate the need to focus interventions aimed at increasing CCS rates within the SPD population.

Activity III: Select the study indicator(s). A study indicator is a quantitative or qualitative characteristic or variable that reflects a discrete event (e.g., an older adult has not received an influenza vaccination in the last 12 months) or a status (e.g., a member's blood pressure is/is not below a specified level) that is to be measured. The selected indicators should track performance or improvement over time. The indicators should be objective, clearly and unambiguously defined, and based on current clinical knowledge or health services research.

Describe the rationale for selection of the study indicator:

Study Indicator 1 calculates the percentage of Medi-Cal SPD women 21 to 64 years of age who received one or more Pap tests during the measurement year or the two years prior to the measurement year. This measure is based on the Cervical Cancer Screening (CCS) measurement specifications in HEDIS[®] 2011 Technical Specifications.

This study topic was selected based on the Health Net 'All County' SPD cervical cancer screening HEDIS® RY2009 result that showed 'All County' CCS administrative rate among Medi-Cal SPDs was 14% lower than the 'All County' non-SPD Medi-Cal administrative rate (48.9% vs. 62.9%). This finding was confirmed both in the Pre-baseline HEDIS[®]-like RY 2010 preliminary results (January 1 2009 through November 30, 2009) and the Baseline HEDIS® RY 2010 results (January 1 2009 through December 31, 2009). Statistically significant differences were seen within all seven counties and in the 'All Counties' rate as shown in Tables 1 and 2 above. The HEDIS[®]-like RY2010 (pre-baseline) CCS administrative "all counties" rate among SPDs (37.9%) was 7.6% lower than the non-SPD population rate (45.5%) and the baseline HEDIS® RY 2010 CCS administrative "all counties" rate among SPDs (47.5%) was 13.9% lower than the non-SPD rate (61.4%). These results indicate the need to focus interventions aimed at increasing CCS rates within the SPD population.

According to the National Health Interview Surveys, women with disabilities are 15% less likely to have visited an OB/GYN in the past year and, most importantly, when women with disabilities visit an OB/GYN, they are 20% less likely to receive a Pap smear than women without disabilities visiting an OB/GYN. Finally, this population is generally considered high risk. high cost and need more support when compared with the other groups by nature of their health care status.

The SPD population was selected over the non-SPD Medi-Cal population for this QIP due to studies that show one of every six persons on Medicaid can be classified as a "younger person with a disability"—that is, a child or an adult under age 65 who qualifies for Medicaid coverage in part because of a disability. As of 2005, almost 22% of the U.S. population suffered from at least one disability, and this proportion is increasing. Additionally, functional impairment is over-represented in the poor, aged, and minority groups. Medi-Cal managed care plans like Health Net should therefore focus on attending to the health

Study Indicator 1 The percentage of eligible Medi-Cal SPD women who received one or more Pap tests during the measurement vear or the two years prior to the measurement year

Drew, J. 2002. Differentials in Access to Cervical Cancer Screening For Women with Disabilities in the US. Results from Health Interview Surveys. www.allacademic.com/meta/p182513 index.html -

D. Liska, B. Bruen, A. Salganicoff, P. Long, and B. Kessler. Medicaid Expenditures and Beneficiaries: National and State Profiles and Trends, 1990-1995, 3rd ed. Kaiser Commission on the Future of Medicaid, 1997.

Centers for Disease Control and Prevention. (2009). Prevalence and most common causes of disability among adults: United States, 2005. MMWR, 58(16), 421-426.

C. Activity III: Select the study indicator(s). A study indicator is a quantitative or qualitative characteristic or variable that reflects a discrete event (e.g., an older adult has not received an influenza vaccination in the last 12 months) or a status (e.g., a member's blood pressure is/is not below a specified level) that is to be measured.

| | rformance or improvement over time. The indicators should be objective, clearly and unambiguously defined, and based on current esearch. |
|------------------------------------|---|
| | needs of all their disabled members. One of the most pressing concerns is the underutilization of preventive care. Research shows that adults with disability receive certain cancer screening rates lower when compared to those without disability. ¹¹ |
| Numerator: (no numeric value) | The number of members in the denominator population who received one or more Pap tests during the measurement year or the two years prior to the measurement year, identified with any of the codes in Table CCS-A in the below attachment. Please refer to the denominator defined below |
| | For a complete description of the 2011 HEDIS® Technical Specifications for the CCS metric, please see the attached. Z:\WH\Common05\ CommQI\1 STAFF FO |
| | The population used for Study Indicator 1 was chosen based on the criteria in these specifications for the Medicaid population using administrative specifications and the optional exclusion criteria for women who had a hysterectomy with no residual cervix. In addition, the population for Study Indicator one excludes members who are not coded as SPDs (Aged/Blind/Disabled-See Activity IV for list of codes). |
| Denominator: (no numeric value) | Female Medi-Cal SPD (coded as Aged/Blind/Disabled-See Activity IV for list of codes) members aged 24 to 64 years old as of December 31 of the measurement year, who are continuously enrolled during the measurement year defined as no more than a one month gap of enrollment and who have not had a hysterectomy with no residual cervix (Identified with any of the codes in Table CCS-B in the above attachment) as noted as far back as possible in the member's history through December 31 of the measurement year as identified through administrative data. |
| Baseline Measurement Period | January 1, 2009 through December 31, 2009 |
| | (A Pre-Baseline result, January 2009 – November 2009 was reported because initial measurement was taken prior to end of the standard baseline measurement period (December 31, 2009) and prior to the standard 90-day claims data run-out period. 90 days is considered sufficient time for claims data collection and reporting to be mostly complete. Although these results are |

Wei, W., Findlay, P. A., & Sambamoorthi, U. (2006). Disability and receipt of clinical preventive services among women. Women's Health Issues, 16(6), 289-296.

| adult has not received an influenza vacc | ndicator(s). A study indicator is a quantitative or qualitative characteristic or variable that reflects a discrete event (e.g., an older cination in the last 12 months) or a status (e.g., a member's blood pressure is/is not below a specified level) that is to be measured. In reformance or improvement over time. The indicators should be objective, clearly and unambiguously defined, and based on current research. | | | |
|--|---|--|--|--|
| | not final and are therefore not comparable to any finalized results, they provide a valid method to compare the Medi-Cal SPD and non-SPD populations, and the SPD subgroups because the data has been pulled consistently for all subgroups.) | | | |
| Baseline Goal | A 1% improvement from baseline to Remeasurement 1 (for all seven counties) and another 1% improvement from Remeasurement 1 to Remeasurement 2 for all six counties and for "All County" administrative rate. | | | |
| | A total increase of 2% improvement from baseline to Remeasurement 2 for each of the six counties and the "All County" administrative rate. | | | |
| | Note: 'All county' SPD includes all Health Net contracted counties (Fresno, Kern, Los Angeles, Sacramento, San Diego, Stanislaus and Tulare) in Measurement Years (MY) 2009, and 2010. Starting MY 2011, Fresno County will not be included in the interventions, analysis, and report. Fresno, Madera and Kings Counties contracted with CalViva Health effective March 1, 2011. As a result of the CalViva Health Medi-Cal contract with DHCS, Remeasurement 2 report for Health Net will only include Kern, Los Angeles, Sacramento, San Diego, Stanislaus, and Tulare counties. Fresno County will not be included in the Remeasurement 2 report. | | | |
| Remeasurement 1 Period | January 1, 2010 through December 31, 2010 | | | |
| Remeasurement 2 Period | January 1, 2011 through December 31, 2011 | | | |
| Benchmark | N/A | | | |
| Source of Benchmark | N/A | | | |

D. Activity IV: Use a representative and generalizable study population. The selected topic should represent the entire eligible population of Medicaid members with system wide measurement and improvement efforts to which the study indicators apply. Once the population is identified, a decision must be made whether or not to review data for the entire population or a sample of that population. The length of members' enrollment needs to be defined to meet the study population criteria.

Study population:

Study indicator 1 includes all female SPD Medi-Cal members age 24 to 64 years old as of December 31 of the measurement year, who were identified in the eligible population of the 'Cervical Cancer Screening (CCS)' 2011 HEDIS® metric. The study population needs to be continuously enrolled as defined by no more than a 1-month gap in coverage (i.e., a member whose coverage lapses for 2 months [60 days] is not considered continuously enrolled). These female Medi-Cal members need to be in the SPD (Aged, Blind/Disabled, and Disabled) capitation groups identified with the following Medi-Cal Aid Codes:

Aged: 10, 14, 16, 17, 18, 1E, 1H Blind/Disabled: 20, 24, 26, 27, 2E, 6A

Disabled: 36, 60, 63, 64, 66, 67, 68, 6C, 6E, 6H, 6J, 6N, 6P, 6R, 6V, 6W, 6X, 6Y

A complete description for each of the above AID Codes is provided in the document below.



A complete description of all eligibility criteria for the HEDIS® CCS metric is provided below.



These specifications are based on the 2011 HEDIS[®] Technical Specifications, Volume 2. The population used for Study Indicator 1 was chosen based on the criteria in these specifications for the Medicaid population using administrative specifications and the optional exclusion criteria for women who had a hysterectomy with no residual cervix and the additional requirement that the member of the SPD population as described in the study indicator above.

Note: For Pre-Baseline and Baseline the member eligibility specification were based on the 2010 HEDIS[®] Technical Specifications. For Remeasurement 1 the member eligibility HEDIS[®] specifications will be based on the 2011 HEDIS[®] Technical Specifications, and for Remeasurement 2, the member eligibility HEDIS[®] specifications will be based on the 2012 HEDIS[®] Technical Specifications.

Note: This study population includes the entire eligible population and is not a sample.

| E. Activity V: Use sound sampling methods. If sampling is used to select members of the study, proper sampling techniques are necessary to provide valid and reliable | ı |
|--|---|
| information on the quality of care provided. The true prevalence or incidence rate for the event in the population may not be known the first time a topic is studied. | 1 |

Sampling methods:

No Sampling was used. All SPD female Medi-Cal members age 24 to 64 years old as of December 31 of the measurement year who were identified in the eligible population of the 'Cervical Cancer Screening (CCS)' 2011 HEDIS[®] metric in all counties were included.

| County | Measure | Sample Error and Confidence Level | Sample Size | Population | Method for Determining Size (Describe) | Sampling Method (Describe) |
|--------------|---|--------------------------------------|-------------|---|---|----------------------------|
| | Study Indicator 1: No sampling was used. All eligible SPD members identified in the HEDIS [®] eligible population in all counties were included in the study | N/A | N/A | Measurement Period: January 1, 2010 – December 31, 2010 (Remeasureme nt 1 RY 2011) | N/A | N/A |
| All Counties | | | | 9,293 SPD members found through Health Net Administrative Data | | |
| Fresno | | | | 1445 SPD Members | | |
| Kern | | | | 663 SPD Members | | |
| Los Angeles | | | | 5,320 SPD Members | | |
| Sacramento | | | | 1051 SPD Members | | |
| San Diego | | | | 320 SPD Members | | |
| Stanislaus | | | | 292 SPD Members | | |

| Tulare | | 202 SPD Members | |
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F. Activity VIa: Use valid and reliable data collection procedures. Data collection must ensure that the data collected on QIP indicators are valid and reliable. Validity is an indication of the accuracy of the information obtained. Reliability is an indication of the repeatability or reproducibility of a measurement.

F. Activity VIa: Use valid and reliable data collection procedures. Data collection must ensure that the data collected on QIP indicators are valid and reliable. Validity is an indication of the accuracy of the information obtained. Reliability is an indication of the repeatability or reproducibility of a measurement.

Data Collection:

Data collection for Remeasurement 1 was based on administrative data RY HEDIS® 2011 Specifications

Administrative data is systematically collected by the plan for all 7 counties throughout the measurement period. The Health Net HEDIS[®] team organizes and prepares the data for the audit software data integration (see flow chart diagram attached below) to calculate the HEDIS[®] rates for NCQA submission. Upon receipt of the Final Audit Report (Summer of HEDIS[®] Reporting Year) the Quality Improvement (QI) Department collects the final HEDIS[®] data from the HEDIS[®] team to data mine and analyze Study Indicator 1. Therefore the data collection cycle for the plan and the HEDIS[®] team is continuous while the data collection and data analysis cycles by the QI Department is once a year.

Because the pre-baseline measurement period occurred prior to the end of the 2009 Measurement Year (MY) and the Health Net HEDIS® team did not complete the final results of the RY 2010 HEDIS® CCS metric until the summer of 2010, the QI Department collected the pertinent data directly from the Health Net data systems to obtain pre-baseline results of all seven counties for this QIP. This data extraction occurred on December 1, 2009 and therefore excluded December 2009 claims/encounter and enrollment data and was pulled prior to the standard 90-day claims data run-out period that is considered sufficient time for claims data collection and reporting to be mostly complete. Therefore, the pre-baseline measurement is based on data that is considered to be mostly complete from January 1, 2009 through August 31, 2009 for all seven counties. Although these results are not the final results and are therefore not comparable to any finalized results, they have provided a valid method to compare the Medi-Cal SPD and non-SPD populations, and SPD subgroups in support of the study topic because the data was pulled consistently for all subgroups. The official baseline results are based on the final RY2010 HEDIS® data prepared by the Health Net Health

Timeline for Collection of Baseline and Remeasurement Data:

Pre Baseline: Data was collected for January 1, 2009 through November 30, 2009 (Data collection occurred prior to standard 90 day claims data run-out period)

Baseline: Data was collected for January 01, 2009 through December 31, 2009.

Remeasurement 1: Data was collected January 01, 2010 through December 31, 2010.

Remeasurement 2: Data to be collected for January 01, 2011 through December 31, 2011.

F. Activity VIa: Use valid and reliable data collection procedures. Data collection must ensure that the data collected on QIP indicators are valid and reliable. Validity is an indication of the accuracy of the information obtained. Reliability is an indication of the repeatability or reproducibility of a measurement.

Calculation of Study Indicators

Study Indicator 1

Study indicator 1 calculates the percentage of eligible Medi-Cal SPD women 24 to 64 years of age as of December 31 of the measurement year who received one or more Pap tests during the measurement year or the two years prior to the measurement year.

Step 1 Data Collection: For the pre-baseline results included in this QIP, member data for all seven counties were obtained directly from the Health Net data systems by the Senior Research Analyst S. Clark, MSPH. Data for the Medi-Cal population is stored in QCARE within Health Net's IBM Mainframe and is pulled using the TSO environment that connects to the IBM mainframe where QCARE is located. Within the TSO environment, SAS® software is utilized for all data extractions.

For the baseline results of all seven counties as reported in 2010, the QI Department Research and Analysis Team (QIRA) received the final HEDIS® datasets for the CCS HEDIS® metric for each county from the HEDIS® team in the form of text files. The datasets contain the member and provider information for each Health Net member identified in the eligible population (denominator) for this HEDIS® metric. Each member is classified with a coding system to identify their eligibility in the numerator and in the denominator as defined in the RY2010 HEDIS® Technical Specifications for the CCS HEDIS® metric. The QI department then extracted enrollment data from QCARE to identify and isolate the SPD population within the RY2010 HEDIS® data prepared by the Health Net HEDIS® team.

For the Remeasurement 1 results of all seven counties as reported in 2011, the QI Department Research and Analysis Team (QIRA) received the final HEDIS® datasets for the CCS HEDIS® metric for each county from the HEDIS® team in the form of text files. The datasets contain the member and provider information for each Health Net member identified in the eligible population (denominator) for this HEDIS® metric. Each member is classified with a coding system to identify their eligibility in the numerator and in the denominator as defined in the RY2011 HEDIS® Technical Specifications for the CCS HEDIS® metric. The QI department then extracted enrollment data from QCARE to identify and isolate the SPD population within the RY2011 HEDIS® data prepared by the Health Net HEDIS® team.

Step 2 Data Analysis – Calculate Study Indicator 1. For each county, divide the total number of SPD members identified in the numerator by the total number of SPD members identified in the denominator found in the CCS HEDIS® dataset for each HEDIS® reporting year. A higher rate indicates appropriate cervical cancer screenings (i.e. the proportion who received one or more Pap tests to screen for cervical cancer during the measurement period). Multiply ratio by 100 to calculate the percentage.

Study Indicator
$$1 = \left(\frac{Total\ Number\ of\ SPD\ Members\ in\ the\ HEDIS\ Numerator}{Total\ Number\ of\ SPD\ Members\ in\ the\ HEDIS\ Deno\ min\ ator}\right) x\ 100$$

All Study Indicator 1 results will be reported for each of the seven Health Net contracted counties as well as the combined 'All County' Rate. The results will additionally be stratified and analyzed by age, language and ethnicity at both the individual county and 'All County' levels.

Note: 'All county' SPD includes all Health Net contracted counties (Fresno, Kern, Los Angeles, Sacramento, San Diego, Stanislaus and Tulare) in Measurement Years (MY) 2009, and 2010. Starting MY 2011, Fresno County will not be included in the interventions, analysis, and report. Fresno, Madera and Kings Counties contracted with CalViva Health effective March 1, 2011. As a result of the CalViva Health Medi-Cal contract with DHCS, Remeasurement 2 report for Health Net will only include Kern, Los Angeles, Sacramento, San Diego, Stanislaus, and Tulare counties. Fresno County will not be included in the Remeasurement 2 report.

F. Activity VIa: Use valid and reliable data collection procedures. Data collection must ensure that the data collected on QIP indicators are valid and reliable. Validity is an indication of the accuracy of the information obtained. Reliability is an indication of the repeatability or reproducibility of a measurement.

| Data Sources | |
|--|---|
| [] Hybrid (medical/treatment records and administrative) [] Medical/Treatment Record Abstraction Record Type [] Outpatient [] Inpatient [] Other Other Requirements [] Data collection tool attached [] Data collection instructions attached [] Summary of data collection training attached [] IRR process and results attached | [X] Administrative Data Data Source [X] Programmed pull from claims/encounters [] Complaint/appeal [] Pharmacy data [] Telephone service data /call center data [] Appointment/access data [] Delegated entity/vendor data [X] Other Monthly FAME membership data Other Requirements [] Data completeness assessment attached [] Coding verification process attached |
| Description of data collection staff (include training, experience, and qualifications): | [] Survey Data Fielding Method [] Personal interview [] Mail [] Phone with CATI script [] Phone with IVR [] Internet [] Other Other Requirements [] Number of waves [] Response rate [] Incentives used |

| F. Activity VIb: Determine the data collection cycle. | Determine the data analysis cycle. | | |
|--|------------------------------------|--|--|
| [X] Once a year | [X] Once a year | | |
| [] Twice a year | [] Once a season | | |
| [] Once a season | [] Once a quarter | | |
| [] Once a quarter | [] Once a month | | |
| Once a month | [] Continuous | | |
| [] Once a week | [] Other (list and describe): | | |
| [] Once a day | | | |
| [] Continuous | For all counties | | |
| Other (list and describe): | | | |
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| For all Counties | | | |
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| F. Activity VIc. Data analysis plan and other pertinent methodological features. | | | |

Estimated degree of administrative data completeness: 84.8 percent.

For the Study, Health Net will use administrative data only based on RY 2010, RY 2011 and RY 2012 HEDIS[®] Specifications to compare results from baseline, Remeasurement 1 and Remeasurement 2, respectively to have consistency and validity of results in all seven counties.

Describe the process used to determine data completeness and accuracy.

In HEDIS[®] RY 2011, the degree of administrative data completeness was found to be 84.8% complete for the CCS metric compared to hybrid data completeness based on HEDIS[®] data for the entire Medi-Cal CCS eligible population. Data completeness was calculated using the results for the Medi-Cal Accreditation CCS Metric (all counties) by the following formula:

$$Data\ Completene\ ss = \left(\frac{Number\ of\ Numerator\ Events\ found\ in\ Ad\ min\ istrative\ Data}{Total\ Number\ of\ Re\ ported\ Numerator\ Events\ (Ad\ min\ istrative\ \&\ Medical\ Re\ cord\ Data)}\right)\ x\ 100$$

In addition, the most recent HEDIS[®] Final Audit Report as attached below validated that Health Net met the RY2011 HEDIS[®] Technical Specifications.

HEDIS[®] measures are specified for one or more of three data collection methods – Administrative, Hybrid or Survey. Health Net utilizes the Administrative and Hybrid methods on a number of applicable HEDIS[®] metrics. The Administrative method is used to identify the eligible population and numerator using administrative data found in the

organization's databases. Hybrid method is used to identify the numerator using both administrative and medical record data. Medical records may have information on a visit by a Health Net member that is not found in the administrative databases. Factors that may influence the lack of administrative data relate to the incompleteness of encounter information relayed to the health plan from Participating Physician Groups (PPGs), who may assume financial responsibility for certain services. Payment from the health plan is not required in the transfer of encounter data; unlike in cases where a claim is filed for payment from the health plan to the PPG. To determine administrative data completeness, Health Net's HEDIS® data of the Cervical Cancer Screening metric, which is calculated using both administrative and hybrid methods, is provided below. The table includes results for the entire Medi-Cal CCS eligible population in addition to the results for the SPD sub-population within this group.

| | | HEDIS® RY 201 | 1 (%) | |
|---------------------------|------------------------|------------------------|------------------------|------------|
| | | | Total Number of | |
| | | | Reported Numerator | |
| | # of Numerator Events: | # of Numerator Events: | Events (Administrative | |
| | Administrative Data | Medical Records | Data+Medical Records) | % Complete |
| Cervical Cancer Screening | 1446 | 259 | 1705 | 84.81 |

Supporting documentation:

Final RY2011 HEDIS® Audit Report



Flow chart diagram of HEDIS® administrative data collection to be utilized during baseline and Remeasurement years.

Supporting documentation:



G. Activity VIIa: Include improvement strategies. (Interventions for improvement as a result of analysis). List chronologically the interventions that have had the most impact on improving the measure. Describe only the interventions and provide quantitative details whenever possible (e.g., "Hired four customer service representatives" as opposed to "Hired customer service representatives"). Do not include intervention planning activities.

| County | Date Implemented (MMYY) | Check if Ongoing | Interventions | Barriers That Interventions Address |
|---|--|---|---|---|
| Note: 'All county' SPD i 2009, and 2010. Starting Health effective March I | g MY 2011, Fresno County , 2011. As a result of the C | nter "All" in th tracted countie will not be incl CalViva Health | e County column. s (Fresno, Kern, Los Angeles, Sacramento, San Diego, S luded in the interventions, analysis, and report. Fresno, Medi-Cal contract with DHCS, Remeasurement 2 report ounty will not be included in the Remeasurement 2 reports. | Madera and Kings Counties contracted with CalViva for Health Net will only include Kern, Los Angeles, |
| All Counties o Fresno o Kern o LA o Sacramento o San Diego o Stanislaus o Tulare | 01/10 | | Health Net's customer contact center are provided access to the list of providers and offices that provide access and accommodation to SPD members in all seven counties. New and current SPD members who contact HN customer contact center verify the type of accommodation available at a provider site. Accommodations provided by provider offices include but are not limited to: accessible parking spaces doorways have a minimum of 32" wide and opens at 90 degrees elevator wide enough for wheelchair and have Braille buttons electronic beds accessible scales These data are collected through the Facility Site Review audits and Physical Accessibility Review Surveys. These results are shared with HN customer contact center. | Challenge in identifying providers who can provide SPD access in all seven counties |
| All Counties o Fresno | 04/10 | | Published an article in the Provider E-newsletter the importance of preventive health care screening i.e. | Providers may not be aware that SPDs need Pap testing |

| o Kern o LA o Sacramento o San Diego o Stanislaus o Tulare All Counties o Fresno o Kern o LA o Sacramento | 04/10 | CCS that include SPD population for all seven counties Sent all providers in the seven counties list of their SPD eligible members due for CCS (Pap Testing). The letter encouraged providers to reach out to their patients listed who are due for Pap testing. Letters were sent to 911 PCPs and 196 clinics in all | Providers may not perform Pap testing to SPDs since it is time consuming and some takes up more staff resources Providers may not be aware that preventive screening rates are lower for members with disabilities. Providers may not be aware that SPDs need Pap testing Providers may not perform Pap testing to SPDs since it is time consuming and some takes up more staff resources |
|--|-------|--|--|
| San DiegoStanislausTulare | | counties. | Providers may not be aware that preventive screening rates are lower for members with disabilities. |
| All Counties o Fresno o Kern o LA o Sacramento o San Diego o Stanislaus o Tulare | 05/10 | Health Net identified 6,863 SPD members in all seven counties who did not have CCS in the last two years. An IVR reminder call in English and Spanish was initiated encouraging CCS negative SPD women to make appointment with their doctor for Pap testing. Reach rate for the IVR call was 43.4% | Members are not aware that early detection through Pap testing results in better chance for recovery Members think that Pap testing is complicated and too uncomfortable a procedure Members think that since they are asexual Pap testing may not be needed SPD members are not told that they need Pap test also |
| All Counties o Fresno o Kern o LA o Sacramento o San Diego o Stanislaus o Tulare | 05/10 | Health Net published an article in the member newsletter titled 'Be Well with Health Net" that discussed the importance of CCS screening- Pap test. The newsletters were mailed to all members in all counties | Members are not aware that early detection through Pap testing results in better chance for recovery Member thinks that Pap testing is complicated and too uncomfortable a procedure Members think that since they are asexual Pap testing may not be needed SPD members are not told that they need Pap test also |
| All Counties o Fresno o Kern o LA | 06/10 | Office sites in all seven counties are evaluated for appropriate medical equipment and physical accessibility to the facility for SPDs by facility site review RNs. These data are compiled, updated and | Pulling data to determine Providers who have appropriate equipments to examine members is difficult and time consuming Some provider's offices do not have health |

| SacramentoSan DiegoStanislausTulare | | shared with customer contact center to share with new and concurrent SPD members. | care equipments for examining members with disabilities. Providers do not believe accessible facilities are needed. Lack of financial resources to procure appropriate medical equipment for SPDs. |
|---|-------|--|---|
| All Counties o Fresno o Kern o LA o Sacramento o San Diego o Stanislaus o Tulare | 09/10 | The selected health education topic in September was Preventive Screening Guideline. One topic that was emphasized was CSS – Pap testing every one to three years for women 21-64 years old. To promote the topic selected the Customer Solution Specialists' (CSS) distributed Well Woman Pad and Women Screening guidelines to providers reminding them to have their patients including SPD women 21-64 years old who are due for Pap testing be scheduled for testing. | Providers may not be aware that SPDs need Pap testing Providers may not perform Pap testing to SPDs since it is time consuming and some takes up more staff resources Providers may not be aware that preventive screening rates are lower for members with disabilities. |
| All Counties o Fresno o Kern o LA o Sacramento o San Diego o Stanislaus o Tulare | 11/10 | The Member Newsletter published an article titled: "Women: Check up on your health". The article emphasized the importance of cervical cancer screening through Pap testing for those women 21 years and older every one to three years and to call their doctor for appointment. The newsletter also provided the customer service center and nurse advice line phone numbers to call for questions. | Members are not aware that early detection through Pap testing results in better chance for recovery Member thinks that Pap testing is complicated and too uncomfortable a procedure Members think that since they are asexual Pap testing may not be needed SPD members are not told that they need Pap test also |
| All Counties o Kern o LA o Sacramento o San Diego o Stanislaus o Tulare | 04/11 | Providers in the six counties (Kern, LA, Sacramento, San Diego, Stanislaus and Tulare) were sent list of their SPD eligible members who are due for CCS (Pap Testing) and encouraged them to reach out to these members for Pap testing. Letters were sent to 775 PCPs and 171 clinics with a total member of 5,575 members who are due for Pap testing. | Providers may not be aware that SPDs need Pap testing Providers may not perform Pap testing to SPDs since it is time consuming and some takes up more staff resources Providers may not be aware that preventive screening rates are lower for members with disabilities. |
| All Counties o Kern o LA o Sacramento | 04/11 | Published an article in the Provider E-newsletter titled: 'Educating Female Patients on Cervical Cancer Screening and Risk Factors'. The article also encouraged providers to counsel women over | Providers may not be aware that SPDs need Pap testing Providers may not perform Pap testing to SPDs since it is time consuming and some |

| San DiegoStanislausTulare | | age 40 beyond child bearing age to continue this important testing that includes SPDs. | takes up more staff resources Providers may not be aware that preventive screening rates are lower for members with disabilities. |
|---|-------|---|---|
| All Counties O Kern O LA O Sacramento O San Diego O Stanislaus O Tulare | 05/11 | Health Net identified 5,434 SPD members in all six counties who did not have CCS in the last two years and made an IVR reminder call in English and Spanish encouraging them to make appointment with their doctor for Pap testing. Reach rate for the IVR call was 43.4% | Members are not aware that early detection through Pap testing results in better chance for recovery Members think that Pap testing is complicated and too uncomfortable a procedure Members think that since they are asexual Pap testing may not be needed SPD members are not told that they need Pap test also |
| All Counties o Kern o LA o Sacramento o San Diego o Stanislaus o Tulare | 05/11 | In May 2011, providers who responded to the provider member profile mailing were sent letters acknowledging their efforts in improving CCS and addressing the concerns they have about the list of members sent to them. The letter was signed by the Health Net Senior Medical Director and follow-up calls were made by Health Net's Sr. QI Specialist for providers who had comments and concerns that were not covered by the letter. | Providers may not be aware that SPDs need Pap testing Providers may not perform Pap testing to SPDs since it is time consuming and some takes up more staff resources Providers may not be aware that preventive screening rates are lower for members with disabilities. |
| All Counties o Kern o LA o Sacramento o San Diego o Stanislaus o Tulare | 07/11 | Revised the Well Woman Pad and translated to English, Spanish, Vietnamese, Chinese and Hmong. The Well Woman sheet reminds women to have Pap testing at recommended age and intervals with a tear out to document their last and next Pap testing schedule. These pads are delivered for providers to remind women due for Pap testing and to set up appointment as appropriate | Members think that since they are asexual Pap testing may not be needed SPD members are not told that they need Pap test also |

G. Activity VIIb: Implement intervention and improvement strategies. Real, sustained improvements in care result from a continuous cycle of measuring and analyzing performance, as well as, developing and implementing system wide improvements in care. Describe interventions designed to change behavior at an institutional, practitioner, or member level.

Interventions:

Describe interventions/improvement strategies for each measurement period.

Selection of CCS among SPDs as a QIP is based on available data and studies by literature searches of Medline, PubMed, and NIH. Once a topic is selected as a Quality Improvement Project, barrier analysis is performed and specific barriers are selected to develop initiatives to improve outcomes. Interventions selected are further evaluated for its effectiveness considering time frame and resources needed for implementation. In addition, the proposed QIP topic is presented to the Health Net State Health Program (SHP) Utilization Management (UM)/Quality Improvement (QI) Committee to solicit ideas for causal/barrier analyses and interventions that could lead to improved results. Health Net believes that improvement of CCS among SPD Health Net members will enhance health care status.

On a regular basis at least monthly, the Health Net State Health Program (SHP) Quality Improvement (QI) team meets to discuss the status of quality improvement activities. Discussions include status of initiatives, barriers and/or enhancements to implemented initiatives, processes and responses of targeted population. Once the results of the measurements are in, a brainstorming session is held to analyze QI metrics' results, evaluation of interventions implemented and opportunities for improvement. Annually, Health Net presents the QIP to the State Health Program UM/QI Committee for further analysis, evaluation and plan for interventions.

Barrier analysis is performed to plan for interventions in all seven counties. The QI team in the development of specific barriers put into consideration the analysis performed on age, ethnicity, language and degree of incidence among the targeted population at least annually. A Cause and Effect Fishbone Diagram is developed to identify specific member, provider and health plan barriers. Barriers identified are prioritized and interventions are selected based on its effectiveness and timeliness to initiate the activity to achieve the most impact on outcomes. The baseline results showed more than a 13% CCS difference between SPD and non-SPD populations in the 'All County' results and the difference between SPDs and non-SPDs within each of the seven counties ranged from 11 to 25 percent. As a result of these analyses, interventions implemented were aimed to target the entire Health Net population of SPDs in each of the seven counties with similar interventions in all counties.

Below is the Health Net's fishbone diagram to identify barriers and to plan initiatives believed to increase CCS among female SPD Medi-Cal members in all seven counties.

Note: The barriers identified in the diagram apply to all seven counties.



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G. Activity VIIb: Implement intervention and improvement strategies. Real, sustained improvements in care result from a continuous cycle of measuring and analyzing performance, as well as, developing and implementing system wide improvements in care. Describe interventions designed to change behavior at an institutional, practitioner, or member level.

Analysis by Age, Language and Ethnicity in all seven counties in measurement year 2009

Data Analysis by Age

The MY2009 results were stratified by county and age group, and an adjusted Chi-Square Test of Proportions with an alpha of 0.05 was used to test for differences between age categories for the 'All Counties' results and for the county specific results. (Tables 4a & 4b) There was a significant difference in rates by age group for the 'All County' data and for Fresno, Los Angeles and Sacramento counties, with cervical cancer screening rates decreasing with increasing age. Kern, San Diego, Stanislaus, and Tulare counties did not have statistically significant differences in the CCS rates between age categories. However, each individual county did have a similar age trend, with the exception of Tulare. The inconsistent trend in Tulare is likely due to the lower precision of the estimates due to the small sample sizes in the age strata.

Data Analysis by Language

Note: Testing for language-based differences in rates was done in the 'All Counties' data for those language subgroups with at least 50 members and a similar analysis was done for each county individually. Members with no valid language data or did not have a valid language value in the administrative data (from member eligibility FAME files) are removed from the analysis.

To test for a significant difference in CCS rates for MY2009 between language subgroups that were comprised of at least 50 SPD members within individual counties and at the 'All County' level, a Chi-Square Test of Proportions was conducted using an alpha of 0.05. The 'All Counties' result demonstrated significant differences by language. Spanish and Vietnamese speakers had the highest rates, and the rate for English speakers was about 10% lower than Spanish and Vietnamese speakers. The lowest rates were observed for Cambodian and Hmong speakers. In Los Angeles county, the CCS rates were significantly different between language categories. Spanish speakers had the highest rate with English and Vietnamese speakers trailing slightly behind. Cambodian speakers in L.A. county had a rate that was far below the other groups with a 30% difference compared to Spanish speakers. In Sacramento county, Hmong speakers had a significantly lower rate compared to English speakers. No statistically significant differences were seen between language subgroups in Fresno and Kern counties, though this result could be related to the relatively small sample size for the Spanish-speaking subgroup. Differences between language subgroups in San Diego, Stanislaus, and Tulare counties were not tested because only one language strata had a sample size of 50 or greater in each of these counties. (Tables 6a & 6b)

Data Analysis by Ethnicity

Note: Testing for ethnicity-based differences in rates was done in the 'All Counties' data for those language subgroups with at least 50 members and a similar analysis was done for each county individually. Members with no valid ethnicity data or members who declined to state their ethnicity in the administrative data (from member eligibility FAME files) are removed from the analysis.

To test for a significant difference in CCS rates for MY2009 between ethnic subgroups that were comprised of at least 50 SPD members within individual counties and at the 'All County' level, a Chi-Square Test of Proportions was conducted using an alpha of 0.05. There were significant differences between ethnic subgroups found in the 'All Counties' results. Lower rates were observed for White, Other Asian/Pacific Islander, and Alaskan Native/American Indian ethnicities as compared to Blacks and Hispanics. There were also significant ethnicity differences observed in the Los Angeles and Fresno county specific data, where trends for the higher volume ethnic groups (N≥50) nearly mirrored that of the 'All Counties' data. No statistically significant differences were seen between language subgroups in Kern, Sacramento, San Diego, and Tulare counties and the sample

G. Activity VIIb: Implement intervention and improvement strategies. Real, sustained improvements in care result from a continuous cycle of measuring and analyzing performance, as well as, developing and implementing system wide improvements in care. Describe interventions designed to change behavior at an institutional, practitioner, or member level.

sizes were too small to make valid statistical comparisons between language groups in the county of Stanislaus. (Tables 8a & 8b)

Describe interventions:

Health Net's interventions for all seven counties are similar and are based on past research, barrier analysis, age, ethnicity and language analysis, and cost-effectiveness of each activity. In addition, interventions were implemented noting the baseline SPD and non-SPD CCS results that showed a 13% difference in the 'All County' results and 11 to 25 percent difference among the seven counties.

Based on analysis by age, ethnicity and language for MY2009 and MY2010, providers of all CCS negative members were notified of their patients needing Pap testing and members were reminded through IVR reminder call in English and Spanish in all counties. In addition, the Well Woman pad was revised and made available in English, Spanish, Hmong, Vietnamese and Chinese versions to address those who have indicated speaking a different language than English.

These interventions are planned to increase the proportion of eligible SPDs who receive timely cervical cancer screenings by accomplishing the following: (1) increasing awareness among members and providers about the importance of cervical cancer screening and (2) delivering targeted, regular reminders to members and providers urging them to have the pap test performed.

Interventions from Baseline to Remeasurement 1: MY 2010 (January 1, 2010 through December 31, 2010)

Initiatives Implemented: All Counties

Health Plan Level

The FSR nurses audit, collect and update provider's data in all seven counties who provide accommodation and access to SPDs. This information is shared with the customer contact center who shares with SPD members who needed appropriate SPD access with their providers

Provider Level

- Published an article in the Provider E-newsletter the importance of preventive health care screening like CCS for the SPD population in April 2010
- Sent Providers at all seven counties list of their SPD eligible members needing CCS (Pap Testing) encouraging them to reach out to these members for Pap testing. Letters were sent to 911 PCPs and 196 clinics to all counties in May 2010
- Community Solution Specialists' (CSS) Health Education topic for the month of September 2010 was Preventive Screening guidelines. The CSS distributed Well Woman Pad and Women Screening guidelines reminding providers to have their members tested per guideline including SPDs. Testing includes Pap testing for women 21-64 years old every one to three years.
- In March 2011, Health Net published an article in the Provider E-newsletter the importance of CCS for the SPD population. The article also informed providers that they will be receiving a list of their patients who are due for Pap testing
- In April 2011, providers in the six counties (Kern, LA, Sacramento, San Diego, Stanislaus and Tulare) were sent list of their SPD eligible members needing CCS (Pap Testing) encouraging them to reach out to these members. Letters were sent to 775 PCPs and 171 clinics with a total member of 5,575 members who are due for Pap testing (April 2011)

G. Activity VIIb: Implement intervention and improvement strategies. Real, sustained improvements in care result from a continuous cycle of measuring and analyzing performance, as well as, developing and implementing system wide improvements in care. Describe interventions designed to change behavior at an institutional, practitioner, or member level.

• Published an article in the Provider E-newsletter titled: 'Educating Female Patients on Cervical Cancer Screening and Risk Factors'. The article also encouraged providers to counsel women over age 40 beyond child bearing age to continue this important testing - April 2011

Member Level

- Health Net identified 6,863 SPD members who were CCS negative in all seven counties. IVR reminder calls were made to these CCS negative members to make appointment with their doctor for Pap testing. Reach rate for the IVR call was 43.4%. This initiative was implemented in April 2010
- Health Net published an article in the member newsletter at all seven counties emphasizing the importance of cervical cancer screening for women 21 -64 year olds and emphasized its importance to SPD members. The newsletter was published in May 2010
- Health Net's customer contact center is provided access to the list of providers and offices that provide access and accommodation for SPD members in all seven counties so that new and current SPD members who contact HN customer contact center may be given list of providers who can accommodate members with special needs.
- Health Net identified 5,434 SPD members in all six counties who did not have CCS in the last two years and made an IVR reminder call in English and Spanish encouraging them to make appointment with their doctor for Pap testing. Reach rate for the IVR call was 43.4% May 2011
- Revised and distributed to provider's offices the Well Woman Pad describing the importance of regular women screening. The Well Woman pad was translated to English, Spanish, Vietnamese, Chinese and Hmong. The Well Woman sheet reminds women to have Pap testing at recommended age and intervals with a tear out noting their last and next Pap testing schedule. July2011

Remeasurement 1 to Remeasurement 2:

For Remeasurement 1 to Remeasurement 2 the Health Net Cultural and Linguistic team and Health Education Team was contacted and asked to include CCS topic in their monthly Community Advisory Committee (CAC) meetings to obtain member feedback that will help identify and address barriers and develop possible interventions to improve CCS rates among multiple ethnic groups including bur not limited to Hmong, Russian and Cambodian population.

Note: Starting MY 2011 all interventions will be implemented to six counties. Fresno county was removed from the QIP process since Fresno is currently part of another Health Plan, CalViva Health, effective March 1, 2011.

H. Activity VIIIa. Data analysis: Describe the data analysis process done in accordance with the data analysis plan and any ad hoc analyses (e.g. data mining) done on the selected clinical or nonclinical study indicators. Include the statistical analysis techniques used and p values.

Describe data analysis and interpretation:

Baseline Measurement:

Study Indicator 1

The baseline performance rates will be calculated by age category, language, and ethnicity for 'All Counties' and for each of the seven Medi-Cal counties. All rates for Study Indicator 1 will be calculated as described in Activity VIa. The Remeasurement 2 overall rate for "All Counties" and each of the six counties will be compared to the established goal of an overall 2% increase from Baseline with a goal of 1% improvement from Baseline to Remeasurement 1 and another 1% improvement from Remeasurement 1 to 2.

H. Activity VIIIa. Data analysis: Describe the data analysis process done in accordance with the data analysis plan and any ad hoc analyses (e.g. data mining) done on the selected clinical or nonclinical study indicators. Include the statistical analysis techniques used and p values.

To test for a significant increase between Baseline to Remeasurements 1 and 2, a continuity-adjusted Chi-Square Test of Proportions will be conducted at an alpha of 0.05 for the overall "All Counties" rates as well as for each county rates.

Note: No internal factors were identified that may threaten the validity of the findings for Study Indictor 1.

Baseline Measurement:

Fresno: The Baseline Measurement was calculated for the entire eligible Fresno county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa.

Kern: The Baseline Measurement was calculated for the entire eligible Kern county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa.

Los Angeles: The Baseline Measurement was calculated for the entire eligible Los Angeles county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa.

Sacramento: The Baseline Measurement was calculated for the entire eligible Sacramento county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa.

San Diego: The Baseline Measurement was calculated for the entire eligible San Diego county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa

Stanislaus: The Baseline Measurement was calculated for the entire eligible Stanislaus county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa.

Tulare: The Baseline Measurement was calculated for the entire eligible Tulare county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa

All Counties: The Baseline Measurement was calculated for the entire eligible 'All Counties' population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa.

Baseline to Remeasurement 1:

Fresno: Remeasurement 1 will be calculated for the entire eligible Fresno county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 1, there is a goal of a 1% increase from the Baseline Measurement of Study Indicator 1 for the Fresno County rate. A continuity-

H. Activity VIIIa. Data analysis: Describe the data analysis process done in accordance with the data analysis plan and any ad hoc analyses (e.g. data mining) done on the selected clinical or nonclinical study indicators. Include the statistical analysis techniques used and p values.

adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

Kern: Remeasurement 1 will be calculated for the entire eligible Kern county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 1, there is a goal of a 1% increase from the Baseline Measurement of Study Indicator 1 for the Kern County rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

Los Angeles: Remeasurement 1 will be calculated for the entire eligible Los Angeles county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 1, there is a goal of a 1% increase from the Baseline Measurement of Study Indicator 1 for the Los Angeles County rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

Sacramento: Remeasurement 1 will be calculated for the entire eligible Sacramento county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 1, there is a goal of a 1% increase from the Baseline Measurement of Study Indicator 1 for the Sacramento County rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

San Diego: Remeasurement 1 will be calculated for the entire eligible San Diego county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 1, there is a goal of a 1% increase from the Baseline Measurement of Study Indicator 1 for the San Diego County rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

Stanislaus: Remeasurement 1 will be calculated for the entire eligible Stanislaus county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 1, there is a goal of a 1% increase from the Baseline Measurement of Study Indicator 1 for the Stanislaus County rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

Tulare: Remeasurement 1 will be calculated for the entire eligible Tulare county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 1, there is a goal of a 1% increase from the Baseline Measurement of Study Indicator 1 for the Tulare County rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

All Counties: Remeasurement 1 will be calculated for the entire eligible 'All County' population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 1, there is a goal of a 1% increase from the Baseline Measurement of Study Indicator 1 for the 'All County' rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

Remeasurement 1 to Remeasurement 2:

Kern: Remeasurement 2 will be calculated for the entire eligible Kern county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 2, there is a goal of a 1% increase from Remeasurement 1 and an overall 2% increase from Baseline of Study Indicator 1 for the Kern County rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

H. Activity VIIIa. Data analysis: Describe the data analysis process done in accordance with the data analysis plan and any ad hoc analyses (e.g. data mining) done on the selected clinical or nonclinical study indicators. Include the statistical analysis techniques used and p values.

Los Angeles: Remeasurement 2 will be calculated for the entire eligible Los Angeles county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 2, there is a goal of a 1% increase from Remeasurement 1 and an overall 2% increase from Baseline of Study Indicator 1 for the Los Angeles County rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

Sacramento: Remeasurement 2 will be calculated for the entire eligible Sacramento county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 2, there is a goal of a 1% increase from Remeasurement 1 and an overall 2% increase from Baseline of Study Indicator 1 for the Sacramento County rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

San Diego: Remeasurement 2 will be calculated for the entire eligible San Diego county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 2, there is a goal of a 1% increase from Remeasurement 1 and an overall 2% increase from Baseline of Study Indicator 1 for the San Diego County rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

Stanislaus: Remeasurement 2 will be calculated for the entire eligible Stanislaus county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 2, there is a goal of a 1% increase from Remeasurement 1 and an overall 2% increase from Baseline of Study Indicator 1 for the Stanislaus County rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

Tulare: Remeasurement 2 will be calculated for the entire eligible Tulare county population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 2, there is a goal of a 1% increase from Remeasurement 1 and an overall 2% increase from Baseline of Study Indicator 1 for the Tulare County rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

All Counties: Remeasurement 2 will be calculated for the entire eligible 'All County' population as defined in Activity IV and then stratified by age, language, and ethnicity as described in Activity VIa. For Remeasurement 2, there is a goal of a 1% increase from Remeasurement 1 and an overall 2% increase from Baseline of Study Indicator 1 for the 'All County' rate. A continuity-adjusted Chi-Square test of proportions will be conducted at an alpha of 0.05 to test for a statistically significant change.

Note: Fresno County is contracted with CalViva Health effective March 1, 2011 and will not be included in interventions, analysis, and Remeasurement 2 report

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

Interpretation of study results (address factors that threaten the internal or external validity of the findings for each measurement period):

The submission must include an interpretation of each county's study indicator result for every measurement period. For Baseline, the interpretation should include study indicator results for each county compared to the established goal for that county. For all subsequent Remeasurements, the interpretation should also include

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

statistical testing results including p values.

Baseline Measurement:

Study Indicator 1

Data Analysis by SPD

Table 3 presents the Study Indicator 1 results for the Baseline (Measurement Year 2009) and Remeasurement I (Measurement Year 2010) measurement periods as defined in Activity III. The Measurement Year (MY) 2009 results indicate the percentage of SPD women age 24 to 65 as of December 31, 2009 who were eligible in the denominator for the CCS metric as defined in Activity III who received one or more Pap tests to screen for cervical cancer within calendar years 2007 through 2009 as found in HN administrative data. The MY2010 results indicate the percentage of SPD women age 24 to 65 as of December 31, 2010 who were eligible in the denominator for the CCS metric as defined in Activity III who received one or more Pap tests to screen for cervical cancer within calendar years 2008 through 2010 as found in HN administrative data. The MY2009 and MY2010 results are stratified by SPD/non-SPD cohorts and by county. To test for a significant difference between the MY2009 and MY2010 results, a Continuity Adjusted Chi-Square test of Proportions was conducted at an alpha level of 0.05.

Table 3. Baseline/Remeasurement 1 Results: Study Indicator 1 (%) MY2009 vs. MY2010 by County

| | 200 |)9 | 2 | 010 | P-Value |
|--------------|-------|------|-------|-------|---------------|
| County | N | % | N | % | 2010 vs. 2011 |
| Fresno | 490 | 40.2 | 1,445 | 45.5* | 0.0483* |
| Kern | 711 | 40.9 | 663 | 41.5 | 0.8791 |
| Los Angeles | 5,320 | 50.8 | 5,320 | 50.5 | 0.7712 |
| Sacramento | 647 | 39.6 | 1,051 | 37.4 | 0.3987 |
| San Diego | 378 | 42.1 | 320 | 43.4 | 0.7727 |
| Stanislaus | 275 | 44.7 | 292 | 47.9 | 0.4942 |
| Tulare | 160 | 40.6 | 202 | 46.5 | 0.3084 |
| All Counties | 7,981 | 47.5 | 9,293 | 47.2 | 0.6586 |

^{*} Statistically significant difference (p-value ≤0.05) between MY2009 and MY2010

The goal for the Remeasurement 1 was to increase the 'All Counties' SPD rate as well as each of the seven individual counties' SPD rates by 1% comparing MY2009 and MY2010. This goal was met for the SPD populations in Fresno, San Diego, Stanislaus and Tulare counties. In addition, the increase in Fresno county was statistically significant. However, the goal of a 1% increase was not realized in the other three counties or in the 'All counties' SPD rate. These results indicate the need to further perform barrier analysis and continue to focus interventions aimed at increasing CCS rates within the SPD population, especially in those counties that did not have an increase. The goal for the Remeasurement 2 will be to increase the 'All Counties' SPD rate as well and each of the individual counties' SPD rates by 1% comparing the 2010 and 2011 measurement years and an overall 2% increase when comparing the baseline and 2011 measurement years.

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

Data Analysis by Age

Tables 4a & 4b present the Study Indicator 1 results for the Baseline (MY2009) and Remeasurement I (MY2010) Measurement periods as defined in Activity III stratified by county and age group. A continuity adjusted Chi-Square Test of Proportions with an alpha of 0.05 is used to test for differences in each age categories within counties for the 'All Counties results' and for the county specific results. Cervical cancer screening rates are shown to decrease with increasing age across all counties and at the 'All County' level in MY2010 with statistically significant differences seen in Fresno, Los Angeles, Sacramento, San Diego, and the 'All Counties' rates. Although there was a statistically significant increase in Fresno county in the 'All Ages' rate, there were no statistically significant differences between MY2009 and MY2010 results within the age stratifications in any of the seven counties or at the 'All County' level. However, although not statistically significant, in Fresno and Tulare, there were increases in each age group, with an increase of 7% in the 41-55 year olds in Fresno county and an increase of over 11% in the 24-40 year olds in Tulare county. In Stanislaus there was a 7% increase seen in the rate for the 56-64 year olds. In Sacramento, there were decreases in the 24-40 year old age groups with nearly a 9% decrease in the youngest age group, although not statistically significant.

Table 4a. Study Indicator 1 (%) SPD Results by Age, County, and HEDIS® Measurement Year 2009-2010

| | | FR | ESNO | · · · · · · | | KE | RN | | | LOS AN | GELES | | SACRAMENTO | | | | |
|-------------|-----|------|------|-------------|-----|------|------|------|-------|--------|-------|------|------------|------|------|------|--|
| | 20 | 09* | 20 | 010* | 20 | 009 | 2010 | | 2009* | | 2010* | | 2009* | | 201 | 10* | |
| Age Group | N | % | N | % | N | % | N | % | N | % | N | % | N | % | N | % | |
| 24-40 Years | 124 | 57.3 | 344 | 61.6 | 194 | 45.4 | 195 | 45.1 | 1319 | 55.2 | 1282 | 53.2 | 168 | 51.8 | 243 | 43.2 | |
| 41-55 Years | 212 | 37.7 | 630 | 44.6 | 361 | 41.0 | 307 | 41.0 | 2492 | 51.5 | 2469 | 52.3 | 312 | 37.5 | 511 | 39.7 | |
| 56-64 Years | 154 | 29.9 | 471 | 34.8 | 156 | 35.3 | 161 | 37.9 | 1509 | 45.7 | 1569 | 45.4 | 167 | 31.1 | 297 | 28.6 | |
| All Ages | 490 | 40.2 | 1445 | 45.5 ▲ | 711 | 40.9 | 663 | 41.5 | 5320 | 50.8 | 5320 | 50.5 | 647 | 39.6 | 1051 | 37.4 | |

^{▲ ▼} Statistically significant difference (p-value <0.05) between MY2009 and MY2010

Table 4b. Study Indicator 1 (%) SPD Results by Age, County, and HEDIS® Measurement Year 2009-2010 (Continued)

| | | SAN I | DIEGO | | | STANI | SLAUS | | | TULA | ARE | | A | JNTIES | NTIES | |
|-------------|-----|-------|-------|------|-----|-------|-------|------|------|------|------|------|-------|--------|-------|------|
| | 20 | 009 | 20 | 10* | 20 | 009 | 2010 | | 2009 | | 2010 | | 2009* | | 2010* | |
| Age Group | N | % | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| 24-40 Years | 120 | 46.7 | 99 | 51.5 | 77 | 53.2 | 83 | 50.6 | 52 | 40.4 | 64 | 51.6 | 2054 | 53.2 | 2310 | 52.5 |
| 41-55 Years | 171 | 43.3 | 152 | 43.4 | 127 | 43.3 | 129 | 48.1 | 71 | 42.3 | 84 | 47.6 | 3746 | 47.7 | 4282 | 48.3 |
| 56-64 Years | 87 | 33.3 | 69 | 31.9 | 71 | 38.0 | 80 | 45.0 | 37 | 37.8 | 54 | 38.9 | 2181 | 41.8 | 2701 | 40.8 |
| All Ages | 378 | 42.1 | 320 | 46.6 | 275 | 44.7 | 292 | 48.0 | 160 | 40.6 | 202 | 46.5 | 7981 | 47.5 | 9293 | 47.2 |

^{*} Statistically significant difference (p-value ≤ 0.05) between age categories

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

▲ ▼ Statistically significant difference (p-value <0.05) between MY2009 and MY2010

* Statistically significant difference (p-value ≤ 0.05) between age categories

Data Analysis by Language

Tables 5a & 5b present the Study Indicator 1 results for the Baseline (MY2009) and Remeasurement I (MY2010) Measurement periods as defined in Activity III stratified by county and language. Members with no valid language data or did not have a valid language value in the administrative data (from member eligibility FAME files) are removed from the analysis. Note that percentages with at least 50 Eligible Study Members in the category are bolded and the cell is un-shaded. Because of the sparse data in this table, valid significance testing could not be done using all Language categories. Testing for differences in rates between measurement years and between language categories within counties was done on the 'All Counties' data for those language subgroups with at least 50 members (Tables 6a & 6b). A similar analysis was done for each county individually.

Table 5a. Study Indicator 1 (%) SPD Results by Language, County, and HEDIS® Measurement Year 2009-2010

| | | FRE | SNO | <u> </u> | .,, | KE | RN | | | LOS AN | IGELES | | | SACRA | MENTO | |
|------------------------|-----|------|-----|----------|-----|------|-----|------|------|--------|--------|------|-----|-------|-------|------|
| | 20 | 09 | 20 | 10* | 20 | 09 | 20 | 10 | 200 | 09* | 20 | 10* | 200 |)9* | 20 | 10* |
| Language | N | % | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| American Sign Language | - | - | 3 | 66.7 | - | - | - | - | 12 | 50.0 | 8 | 75.0 | 1 | 100 | 2 | 100 |
| Arabic | - | - | - | - | - | - | - | - | 9 | 33.3 | 9 | 44.4 | - | - | 1 | 0.0 |
| Armenian | 11 | 18.2 | 20 | 35.0 | - | - | - | - | 9 | 33.3 | 11 | 18.2 | 1 | 0.0 | 2 | 0.0 |
| Cambodian | 5 | 20.0 | 11 | 27.3 | 2 | 100 | 1 | 100 | 91 | 28.6 | 87 | 29.9 | 8 | 50.0 | 8 | 62.5 |
| Cantonese | - | - | - | - | - | - | - | - | 19 | 52.6 | 21 | 57.1 | 19 | 36.8 | 30 | 43.3 |
| English | 323 | 44.0 | 987 | 47.0 | 584 | 40.9 | 553 | 41.6 | 3698 | 49.9 | 3766 | 49.7 | 366 | 44.3 | 610 | 38.2 |
| Farsi | 1 | 100 | 1 | 100 | - | - | - | - | 11 | 63.6 | 8 | 62.5 | 2 | 50.0 | 3 | 33.3 |
| Hmong | 15 | 13.3 | 101 | 22.8 | - | - | - | - | - | - | - | - | 85 | 29.4 | 98 | 36.7 |
| Japanese | - | - | - | - | 1 | 0.0 | - | - | 1 | 0.0 | 2 | 50.0 | - | - | 1 | 0.0 |
| Korean | - | - | - | - | - | - | - | - | 4 | 25.0 | 4 | 0.0 | - | - | - | - |
| Lao | 2 | 0.0 | 10 | 30.0 | 1 | 0.0 | - | - | 1 | 0.0 | 1 | 0.0 | 25 | 20.0 | 27 | 33.3 |
| Mandarin | - | - | - | - | - | - | - | - | 12 | 66.7 | 11 | 54.6 | - | - | - | - |
| Mien | - | - | - | - | - | - | - | - | - | - | - | - | 8 | 25.0 | 21 | 33.3 |
| Other Chinese | - | - | - | - | - | - | - | - | 2 | 100 | 5 | 80.0 | - | - | - | - |
| Other Non-English | 4 | 25.0 | 14 | 42.9 | - | - | - | - | 4 | 25.0 | 4 | 0.0 | 10 | 10.0 | 18 | 16.7 |
| Other Sign Language | 1 | 100 | 1 | 100 | - | - | - | - | 1 | 100 | 1 | 0.0 | - | - | - | - |
| Russian | 6 | 50 | 10 | 80.0 | - | - | - | - | 2 | 50.0 | 1 | 100 | 12 | 25.0 | 82 | 20.7 |
| Samoan | - | - | - | - | - | - | - | - | 2 | 50.0 | 1 | 0.0 | - | - | - | _ |
| Spanish | 67 | 41.8 | 139 | 52.5 | 69 | 52.2 | 67 | 44.8 | 969 | 58.2 | 948 | 58.4 | 15 | 60.0 | 23 | 65.2 |

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

| Tagalog | - | - | - | - | 1 | 0.0 | 1 | 0.0 | 8 | 37.5 | 9 | 44.4 | 5 | 60.0 | 6 | 50.0 |
|---------------|-----|------|------|------|-----|------|-----|------|------|------|------|------|-----|------|-----|------|
| Thai | - | - | - | - | - | - | - | - | 1 | 0.0 | 1 | 0.0 | - | - | - | - |
| Turkish | - | - | 1 | 100 | - | - | - | - | - | - | - | - | - | - | | |
| Vietnamese | 1 | 0.0 | 3 | 66.7 | - | - | - | - | 50 | 54.0 | 49 | 67.4 | 29 | 65.5 | 36 | 58.3 |
| All Languages | 436 | 41.5 | 1301 | 45.7 | 658 | 42.1 | 622 | 42.0 | 4907 | 51.2 | 4947 | 51.1 | 587 | 41.2 | 968 | 37.7 |

^{▲ ▼} Statistically significant difference (p-value ≤0.05) between MY2009 and MY2010

Table 5b. Study Indicator 1 (%) SPD Results by Language, County, and HEDIS® Measurement Year 2009-2010

| | | SAN I | DIEGO | | | STANIS | SLAUS | | | TUL | ARE | | | ALL CO | OUNTIES | | |
|------------------------|-----|-------|-------|------|-----|--------|-------|------|-----|------|-----|------|------|--------|---------|------|--|
| | 20 | 09 | 20 | 10 | 20 | 09 | 20 | 10 | 20 | 09 | 20 | 10 | 200 |)9* | 201 | 10* | |
| Language | N | % | N | % | N | % | N | % | N | % | N | % | N | % | N | % | |
| American Sign Language | - | - | - | - | - | - | - | - | - | - | - | - | 13 | 53.8 | 13 | 76.9 | |
| Arabic | 6 | 50.0 | 2 | 50.0 | 1 | 0.0 | 1 | 0.0 | - | - | - | - | 16 | 37.5 | 13 | 38.5 | |
| Armenian | - | - | | | - | - | - | - | - | - | - | - | 21 | 23.8 | 33 | 27.3 | |
| Cambodian | 1 | 0.0 | 1 | 0.0 | 1 | 0.0 | 1 | 100 | - | - | - | - | 108 | 30.6 | 109 | 33.0 | |
| Cantonese | - | - | | | - | - | - | _ | - | - | - | - | 38 | 44.7 | 51 | 49.0 | |
| English | 290 | 41.0 | 246 | 43.1 | 220 | 45.9 | 234 | 48.7 | 117 | 38.5 | 150 | 46.0 | 5598 | 47.4 | 6546 | 47.2 | |
| Farsi | 3 | 66.7 | 3 | 66.7 | 1 | 0.0 | 2 | 50.0 | - | - | - | - | 18 | 61.1 | 17 | 58.8 | |
| Hmong | - | - | - | - | 1 | 0.0 | - | - | 1 | 0.0 | 1 | 0.0 | 102 | 26.5 | 200 | 29.5 | |
| Japanese | - | - | - | - | - | - | - | - | - | - | - | - | 2 | 0.0 | 3 | 33.3 | |
| Korean | - | - | - | - | - | - | - | - | - | - | - | - | 4 | 25.0 | 4 | 0.0 | |
| Lao | 4 | 50.0 | 2 | 100 | - | - | - | - | 2 | 0.0 | 2 | 0.0 | 35 | 20.0 | 42 | 33.3 | |
| Mandarin | 1 | 100 | - | - | - | - | - | - | - | - | - | - | 13 | 69.2 | 11 | 54.5 | |
| Mien | - | - | - | - | - | - | - | - | - | - | - | - | 8 | 25.0 | 21 | 33.3 | |
| Other Chinese | - | - | - | - | - | - | - | - | - | - | - | - | 2 | 100 | 5 | 80.0 | |
| Other Non-English | 5 | 60.0 | 3 | 66.7 | 4 | 25.0 | 5 | 40.0 | 2 | 0.0 | 2 | 0.0 | 29 | 24.1 | 46 | 28.3 | |
| Other Sign Language | - | - | - | - | - | - | - | - | - | - | - | - | 2 | 100 | 2 | 50.0 | |
| Russian | - | - | - | - | 1 | 0.0 | 1 | 0.0 | - | - | - | - | 21 | 33.3 | 94 | 27.7 | |
| Samoan | - | - | - | - | | - | - | - | - | - | - | - | 2 | 50.0 | 1 | 0.0 | |
| Spanish | 24 | 41.7 | 24 | 45.8 | 13 | 76.9 | 21 | 76.2 | 30 | 50.0 | 39 | 51.3 | 1187 | 56.6 | 1261 | 57.0 | |
| Tagalog | - | - | - | - | - | - | - | - | - | - | - | - | 14 | 42.9 | 16 | 43.8 | |

^{*} Statistically significant difference (p-value <0.05) between language categories.

⁻ No Eligible Study Members in this category.

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

| Thai | - | - | - | - | - | - | 1 | - | - | - | - | - | 1 | 0.0 | 1 | 0.0 |
|---------------|-----|------|-----|------|-----|------|-----|------|-----|------|-----|------|------|------|------|------|
| Turkish | - | - | - | - | - | - | - | - | - | - | - | - | 1 | - | 1 | 100 |
| Vietnamese | - | - | - | - | - | - | ı | - | - | - | - | - | 80 | 57.5 | 88 | 63.6 |
| All Languages | 334 | 41.9 | 281 | 44.1 | 242 | 46.3 | 265 | 50.6 | 152 | 39.5 | 194 | 45.9 | 7316 | 48.2 | 8578 | 47.8 |

[▲] V Statistically significant difference (p-value <0.05) between MY2009 and MY2010

To test for a significant difference in CCS rates between MY2009 and MY2010, a continuity adjusted Chi-Square Test of Proportions was conducted using an alpha of 0.05. To test for significant differences within each measurement year between language categories, a Chi-Square Test of Independence was conducted using an alpha of 0.05 (tables 6a & 6b). All significance testing was conducted within individual counties and at the 'All County' level for those language subgroups that were comprised of at least 50 SPD members. The 'All Counties' results were statistically significantly different between language groups and demonstrate that Vietnamese speakers had the highest rates, followed by Spanish speakers, and the rate for English speakers was about 10% lower than Spanish speakers. The lowest rates were observed for Cambodian, Hmong and Russian speakers. No statistically significant differences were seen between measurement years in any of the individual counties or at the 'All County' level, though this result could be related to the relatively small sample sizes in many of the subgroups. There were non-statistically significant increases in the CCS rates for English speakers in most counties, aside from Sacramento, with a 6.1% decrease and Los Angeles which virtually remained the same. Although Hmong speakers had lower rates than any other language groups in many counties, the rate increased by nearly 10% in Fresno county, moving from 13.3% to 22.8%. Additionally, there was more than a 7% increase in Sacramento county and the 'All Counties' rate increased by nearly 10% in Fresno county, moving from 13.3% to 22.8%. Additionally, there was more than a 7% increase in Sacramento county and the 'All Counties' rate increased by over 7% in Kern, bearing in mind the relatively small number of Spanish speakers in these counties. The results for San Diego, Stanislaus, and Tulare counties mainly reflect English speakers since English was the only language subgroup consisting of 50 or greater in each of these counties.

Table 6a Study Indicator 1 (%)HEDIS[®] Measurement Year 2009-2010 SPD Results by Language and County for Language Subgroups with N≥ 50

| | | FRE | SNO | | | KE | RN | | | LOS AN | IGELES | | | SACRA | MENTO | |
|---------------|-----|------|------|------|-----|------|-----|------|------|--------|--------|------|-----|-------|-------|------|
| | 20 | 09 | 201 | 10* | 20 | 09 | 20 | 10 | 200 | 09* | 201 | 10* | 200 |)9* | 201 | 10* |
| Language | N | % | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Cambodian | 5 | 20.0 | 11 | 27.3 | 2 | 100 | 1 | 100 | 91 | 28.6 | 87 | 29.9 | 8 | 50.0 | 8 | 62.5 |
| Cantonese | - | - | - | - | - | - | - | - | 19 | 52.6 | 21 | 57.1 | 19 | 36.8 | 30 | 43.3 |
| English | 323 | 44.0 | 987 | 47.0 | 584 | 40.9 | 553 | 41.6 | 3698 | 49.9 | 3766 | 49.7 | 366 | 44.3 | 610 | 38.2 |
| Hmong | 15 | 13.3 | 101 | 22.8 | - | - | - | - | - | - | - | - | 85 | 29.4 | 98 | 36.7 |
| Russian | 6 | 50 | 10 | 80.0 | - | - | - | - | 2 | 50.0 | 1 | 100 | 12 | 25.0 | 82 | 20.7 |
| Spanish | 67 | 41.8 | 139 | 52.5 | 69 | 52.2 | 67 | 44.8 | 969 | 58.2 | 948 | 58.4 | 15 | 60.0 | 23 | 65.2 |
| Vietnamese | 1 | 0.0 | 3 | 66.7 | - | - | - | - | 50 | 54.0 | 49 | 67.4 | 29 | 65.5 | 36 | 58.3 |
| All Languages | 436 | 41.5 | 1301 | 45.7 | 658 | 42.1 | 622 | 42.0 | 4907 | 51.2 | 4947 | 51.1 | 587 | 41.2 | 968 | 37.7 |

▲ V Statistically significant difference (p-value <0.05) between MY2009 and MY2010

^{*} Statistically significant difference (p-value ≤ 0.05) between language categories.

⁻ No Eligible Study Members in this category.

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

- * Statistically significant difference (p-value < 0.05) between language categories.
- No Eligible Study Members in this category.

Table 6b Study Indicator 1 (%)HEDIS[®] Measurement Year 2009-2010 SPD Results by Language and County for Language Subgroups with N> 50 (continued)

| | | SAN I | DIEGO | | | STANIS | SLAUS | | | TUL | ARE | | | ALL CO | UNTIES | |
|---------------|-----|-------|-------|------|-----|--------|-------|------|-----|------|-----|------|------|--------|--------|------|
| | 20 | 09 | 20 | 10 | 20 | 09 | 20 | 10 | 20 | 09 | 20 | 10 | 200 |)9* | 20 | 10* |
| Language | N | % | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Cambodian | 1 | 0.0 | 1 | 0.0 | 1 | 0.0 | 1 | 100 | - | - | - | - | 108 | 30.6 | 109 | 33.0 |
| Cantonese | - | - | - | - | - | - | - | - | - | - | - | - | 38 | 44.7 | 51 | 49.0 |
| English | 290 | 41.0 | 246 | 43.1 | 220 | 45.9 | 234 | 48.7 | 117 | 38.5 | 150 | 46.0 | 5598 | 47.4 | 6546 | 47.2 |
| Hmong | - | - | - | - | 1 | 0.0 | - | - | 1 | 0.0 | 1 | 0.0 | 102 | 26.5 | 200 | 29.5 |
| Russian | - | - | - | - | 1 | 0.0 | 1 | 0.0 | - | - | - | - | 21 | 33.3 | 94 | 27.7 |
| Spanish | 24 | 41.7 | 24 | 45.8 | 13 | 76.9 | 21 | 76.2 | 30 | 50.0 | 39 | 51.3 | 1187 | 56.6 | 1261 | 57.0 |
| Vietnamese | - | - | - | - | - | - | - | - | - | - | - | - | 80 | 57.5 | 88 | 63.6 |
| All Languages | 334 | 41.9 | 281 | 44.1 | 242 | 46.3 | 265 | 50.6 | 152 | 39.5 | 194 | 45.9 | 7316 | 48.2 | 8578 | 47.8 |

^{▲ ▼} Statistically significant difference (p-value ≤0.05) between MY2009 and MY2010.

^{*} Statistically significant difference (p-value $\le 0.\overline{05}$) between language categories.

⁻ No Eligible Study Members in this category.

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

Data Analysis by Ethnicity

Tables 7a & 7b presents Study Indicator 1 results for the Baseline (MY2009) and Remeasurement I (MY2010) measurement periods as defined in Activity III stratified by county and by ethnicity. Members with no valid ethnicity data or members who declined to state their ethnicity in the administrative data (from member eligibility FAME files) are removed from the analysis. Note that percentages with at least 50 Eligible Study Members in the category are bolded and the cell is un-shaded. Because of the sparse data in this table, valid significance testing could not be carried out using all ethnicity categories. Testing for differences in rates between measurement years and between ethnicity categories within counties was done on the 'All Counties' data for those ethnicity subgroups with at least 50 members (Tables 8a & 8b). A similar analysis was done for each county individually.

Table 7a. Study Indicator 1 (%) SPD Results by Ethnicity, County, and HEDIS® Measurement Year 2009-2010

| | | FR | ESNO | | | KEI | RN | | | LOS AN | IGELES | | | SACRA | MENTO |) |
|--------------------------------------|-----|------|------|--------|-----|------|-----|------|------|--------|--------|------|-----|-------|-------|--------|
| | 200 | 09* | 20 |)10* | 20 | 09 | 20 | 10 | 200 | 09* | 20 | 10* | 20 | 09 | 20 | 10* |
| Ethnicity | N | % | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Alaskan Native or American Indian | 7 | 42.9 | 10 | 50.0 | 9 | 33.3 | 5 | 20.0 | 27 | 48.1 | 25 | 52.0 | 6 | 33.3 | 8 | 37.5 |
| Asian Indian | 1 | 0.0 | 5 | 20.0 | - | - | - | - | 1 | 100 | 1 | 0.0 | 2 | 0.0 | 4 | 0.0 |
| Other Asian or Pacific Islander | 35 | 20.0 | 152 | 30.9 | 4 | 0.0 | 3 | 0.0 | 208 | 39.9 | 217 | 42.4 | 153 | 39.2 | 192 | 43.8 |
| Black | 67 | 55.2 | 240 | 58.8 | 126 | 42.9 | 109 | 48.6 | 1779 | 51.6 | 1786 | 54.0 | 148 | 45.9 | 235 | 46.0 |
| Cambodian | 2 | 50.0 | 7 | 42.9 | 2 | 100 | 1 | 100 | 36 | 27.8 | 27 | 14.8 | 1 | 0.0 | - | - |
| Chinese | - | - | - | - | - | - | | | 22 | 54.5 | 24 | 50.0 | 1 | 100 | 5 | 40.0 |
| Filipino | 1 | 100 | 5 | 20.0 | 2 | 50.0 | - | - | 14 | 28.6 | 12 | 25.0 | 4 | 50.0 | 8 | 12.5 |
| Guamanian | - | - | - | - | - | - | | | 1 | 100 | 1 | 100 | - | - | - | - |
| Hawaiian | - | - | - | - | - | - | | | - | - | 1 | 0.0 | - | - | - | - |
| Hispanic | 210 | 41.9 | 505 | 48.7 | 184 | 45.7 | 161 | 46.0 | 1777 | 53.7 | 1750 | 52.5 | 58 | 34.5 | 95 | 33.7 |
| Japanese | - | - | - | - | - | - | - | - | 1 | 0.0 | 1 | 0.0 | - | - | - | - |
| Korean | - | - | - | - | - | - | - | - | 6 | 33.3 | 3 | 0.0 | - | - | - | - |
| Laotian | - | - | 15 | 6.7 | 1 | 0.0 | - | - | 1 | 0.0 | - | - | 15 | 0.0 | 16 | 12.5 |
| Samoan | - | - | - | - | - | - | - | _ | 6 | 50.0 | 4 | 0.0 | - | - | - | - |
| Vietnamese | 1 | 0.0 | 2 | 50.0 | - | - | - | - | 17 | 58.8 | 21 | 76.2 | 9 | 77.8 | 15 | 73.3 |
| White | 121 | 33.9 | 355 | 40.0 | 331 | 38.1 | 339 | 38.4 | 1039 | 47.4 | 1030 | 45.3 | 165 | 39.4 | 319 | 30.1 ▼ |
| Other | 12 | 41.7 | 41 | 58.5 | 2 | 50.0 | - | - | 48 | 37.5 | 46 | 37.0 | 37 | 27.0 | 53 | 26.4 |
| All Ethnicities | 457 | 40.0 | 1337 | 45.8 ▲ | 661 | 41.0 | 618 | 41.9 | 4982 | 50.6 | 4949 | 50.7 | 599 | 39.2 | 950 | 37.2 |

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

- ▲ ▼ Statistically significant difference (p-value ≤0.05) between MY2009 and MY2010
- * Statistically significant difference (p-value $\leq 0.\overline{05}$) between language categories.
- No Eligible Study Members in this category.

Table 7b. Study Indicator 1 (%) SPD Results by Ethnicity, County, and HEDIS® Measurement Year 2009-2010 (continued)

| | | SAN I | DIEGO | | | STANIS | SLAUS | | | TUL | ARE | | | ALL CO | UNTIES | 5 |
|--------------------------------------|-----|-------|-------|------|-----|--------|-------|------|-----|------|-----|------|------|--------|--------|------|
| | 20 | 09 | 20 | 10 | 20 | 09 | 20 | 10 | 20 | 09 | 20 | 10 | 200 | 09* | 20 | 10* |
| Ethnicity | N | % | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Alaskan Native or American Indian | 3 | 33.3 | 1 | 100 | 3 | 66.7 | 3 | 33.3 | 2 | 0.0 | 2 | 50.0 | 57 | 42.1 | 54 | 46.3 |
| Asian Indian | - | - | - | - | 1 | 100 | 1 | 100 | - | - | | | 5 | 40.0 | 11 | 18.2 |
| Other Asian or Pacific Islander | 17 | 47.1 | 11 | 72.7 | 4 | 0.0 | 6 | 66.7 | 10 | 20.0 | 12 | 25.0 | 431 | 37.1 | 593 | 40.1 |
| Black | 75 | 48.0 | 70 | 47.1 | 21 | 61.9 | 20 | 45.0 | 8 | 62.5 | 8 | 50.0 | 2224 | 50.9 | 2468 | 53.2 |
| Cambodian | 1 | 0.0 | 1 | 0.0 | - | - | - | - | - | - | - | - | 42 | 31.0 | 36 | 22.2 |
| Chinese | - | - | 1 | 100 | 1 | 100 | 1 | 100 | - | - | - | - | 24 | 58.3 | 31 | 51.6 |
| Filipino | 3 | 33.3 | 5 | 60.0 | - | - | 1 | 0.0 | 1 | 0.0 | 1 | 0.0 | 25 | 36.0 | 32 | 25.0 |
| Guamanian | - | - | - | - | - | - | - | - | - | - | - | - | 1 | 100 | 1 | 100 |
| Hawaiian | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 1 | 0.0 |
| Hispanic | 64 | 40.6 | 62 | 40.3 | 52 | 51.9 | 58 | 56.9 | 69 | 40.6 | 89 | 44.9 | 2414 | 50.9 | 2720 | 50.3 |
| Japanese | - | - | - | - | - | - | - | - | - | - | - | - | 1 | 0.0 | 1 | 0.0 |
| Korean | - | - | - | - | - | - | - | - | - | - | - | - | 6 | 33.3 | 3 | 0.0 |
| Laotian | 1 | 0.0 | - | - | - | - | - | - | 1 | 0.0 | 1 | 0.0 | 19 | 0.0 | 32 | 9.4 |
| Samoan | - | - | - | - | - | - | - | - | - | - | - | - | 6 | 50.0 | 4 | 0.0 |
| Vietnamese | - | - | _ | - | - | - | - | - | - | - | - | - | 27 | 63.0 | 38 | 73.7 |
| White | 170 | 38.8 | 134 | 37.3 | 171 | 40.4 | 172 | 45.6 | 57 | 40.4 | 69 | 49.3 | 2054 | 43.0 | 2418 | 41.2 |
| Other | 7 | 57.1 | 7 | 28.6 | | - | 1 | 100 | 1 | 100 | - | - | 107 | 36.4 | 149 | 39.6 |
| All Ethnicities | 341 | 41.6 | 292 | 42.1 | 253 | 44.7 | 263 | 48.7 | 150 | 39.3 | 183 | 45.4 | 7443 | 47.4 | 8592 | 47.3 |

^{▲ ▼} Statistically significant difference (p-value ≤0.05) between 2009 and 2010 Measurement Years.

^{*} Statistically significant difference (p-value $\leq 0.\overline{05}$) between language categories.

⁻ No Eligible Study Members in this category.

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

To test for a significant difference in CCS rates between MY2009 and MY2010, a continuity adjusted Chi-Square Test of Proportions was conducted using an alpha of 0.05. To test for significant differences within each measurement year between ethnicity categories, a Chi-Square Test of Independence was conducted using an alpha of 0.05 (tables 8a & 8b). All significance testing was conducted within individual counties and at the 'All County' level for those ethnic subgroups that were comprised of at least 50 SPD members. Lower rates (p<0.0001) continue to be observed in the 'All County' rates for White and Other Asian/Pacific Islander ethnicities as compared to Blacks and Hispanics, while the rate for Alaskan Native/American Indians became closer to the rates for Blacks and Hispanics, increasing in MY2010 by over 4%, although not statistically significant. Fresno county had increases in each of the ethnic subgroups and the overall increase was statistically significant at nearly 6%. CCS SPD rates in Stanislaus and Tulare counties increased in the Hispanic and White ethnic subgroups, although the changes were not statistically significant. Kern county increased by nearly 6% in Black ethnic subgroup, while in Sacramento, there was nearly a 5% increase for 'Other Asian/Pacific Islanders'. The only subgroup that had a statistically significant decrease (9%) were those of White ethnicity in Sacramento county.

Table 8a Study Indicator 1 (%) HEDIS[®] Measurement Year 2009-2010 SPD Results by Ethnicity and County for Ethnicity Subgroups with N> 50

| | | FRI | ESNO | | | KE | RN | | | LOS AN | IGELES | | | SACRA | MENTC |) |
|--------------------------------------|-----|------|------|--------|-----|------|-----|------|------|--------|--------|------|-----|-------|-------|--------|
| | 200 |)9* | 20 | 10* | 20 | 09 | 20 | 10 | 200 | 09* | 20 | 10* | 20 | 09 | 20 | 10* |
| Ethnicity | N | % | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Alaskan Native or American Indian | 7 | 42.9 | 10 | 50.0 | 9 | 33.3 | 5 | 20.0 | 27 | 48.1 | 25 | 52.0 | 6 | 33.3 | 8 | 37.5 |
| Other Asian or Pacific Islander | 35 | 20.0 | 152 | 30.9 | 4 | 0.0 | 3 | 0.0 | 208 | 39.9 | 217 | 42.4 | 153 | 39.2 | 192 | 43.8 |
| Black | 67 | 55.2 | 240 | 58.8 | 126 | 42.9 | 109 | 48.6 | 1779 | 51.6 | 1786 | 54.0 | 148 | 45.9 | 235 | 46.0 |
| Hispanic | 210 | 41.9 | 505 | 48.7 | 184 | 45.7 | 161 | 46.0 | 1777 | 53.7 | 1750 | 52.5 | 58 | 34.5 | 95 | 33.7 |
| White | 121 | 33.9 | 355 | 40.0 | 331 | 38.1 | 339 | 38.4 | 1039 | 47.4 | 1030 | 45.3 | 165 | 39.4 | 319 | 30.1 ▼ |
| Other | 12 | 41.7 | 41 | 58.5 | 2 | 50.0 | - | - | 48 | 37.5 | 46 | 37.0 | 37 | 27.0 | 53 | 26.4 |
| All Ethnicities | 457 | 40.0 | 1337 | 45.8 ▲ | 661 | 41.0 | 618 | 41.9 | 4982 | 50.6 | 4949 | 50.7 | 599 | 39.2 | 950 | 37.2 |

^{▲ ▼} Statistically significant difference (p-value ≤0.05) between MY2009 and MY2010

^{*} Statistically significant difference (p-value $\le 0.\overline{05}$) between language categories.

⁻ No Eligible Study Members in this category.

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

Table 8b Study Indicator 1 (%) HEDIS[®] HEDIS[®] Measurement Year 2009-2010 SPD Results by Ethnicity and County for Ethnicity Subgroups with N> 50 (Continued)

| | | SAN I | DIEGO | | | STANIS | SLAUS | | | TUL | ARE | | | ALL CO | UNTIES | |
|--------------------------------------|-----|-------|-------|------|-----|--------|-------|------|-----|------|-----|------|------|--------|--------|------|
| | 20 | 09 | 20 | 10 | 20 | 09 | 20 | 10 | 20 | 09 | 20 | 10 | 200 |)9* | 201 | 10* |
| Ethnicity | N | % | N | % | N | % | N | % | N | % | N | % | N | % | N | % |
| Alaskan Native or American Indian | 3 | 33.3 | 1 | 100 | 3 | 66.7 | 3 | 33.3 | 2 | 0.0 | 2 | 50.0 | 57 | 42.1 | 54 | 46.3 |
| Other Asian or Pacific Islander | 17 | 47.1 | 11 | 72.7 | 4 | 0.0 | 6 | 66.7 | 10 | 20.0 | 12 | 25.0 | 431 | 37.1 | 593 | 40.1 |
| Black | 75 | 48.0 | 70 | 47.1 | 21 | 61.9 | 20 | 45.0 | 8 | 62.5 | 8 | 50.0 | 2224 | 50.9 | 2468 | 53.2 |
| Hispanic | 64 | 40.6 | 62 | 40.3 | 52 | 51.9 | 58 | 56.9 | 69 | 40.6 | 89 | 44.9 | 2414 | 50.9 | 2720 | 50.3 |
| White | 170 | 38.8 | 134 | 37.3 | 171 | 40.4 | 172 | 45.6 | 57 | 40.4 | 69 | 49.3 | 2054 | 43.0 | 2418 | 41.2 |
| Other | 7 | 57.1 | 7 | 28.6 | - | - | 1 | 100 | 1 | 100 | - | - | 107 | 36.4 | 149 | 39.6 |
| All Ethnicities | 341 | 41.6 | 292 | 42.1 | 253 | 44.7 | 263 | 48.7 | 150 | 39.3 | 183 | 45.4 | 7443 | 47.4 | 8592 | 47.3 |

- ▲ ▼ Statistically significant difference (p-value <0.05) MY2009 and MY2010
- * Statistically significant difference (p-value ≤ 0.05) between language categories.
- No Eligible Study Members in this category.

Baseline Measurement:

Fresno: The baseline rate for SPDs in Fresno county was 40.2% and was statistically significantly lower than the Non-SPD rate of 62.1% (Table 2). A statistically significant difference between age groups was seen in Fresno county (Table 4a) with cervical cancer screening rates decreasing with increasing age. No statistically significant differences were seen in Fresno county between language subgroups (Table 6a). Ethnic subgroups showed statistically significant differences in this baseline measurement (Table 8a) with Whites being the lowest performing group followed by Hispanics. Blacks had the highest rate by 13.3% as compared to Hispanics.

Kern: The baseline rate for SPDs in Kern county was 40.9% and was statistically significantly lower than the Non-SPD rate of 55.3% (Table 2). No statistically significant differences were seen between age groups in Kern county (Table 4a). However, the rates demonstrated a decrease in cervical cancer screening rates with increasing age. No statistically significant differences were seen in Kern county between language (Table 6a) or ethnic subgroups (Table 8a).

Los Angeles: The baseline rate for SPDs in L.A. county was 50.8% and was statistically significantly lower than the Non-SPD rate of 62.1% (Table 2). A statistically significant difference between age groups was seen in L.A. county (Table 4a) with cervical cancer screening rates decreasing with increasing age. Statistically significant differences between language categories was seen in this county (Table 6a) with Spanish speakers having the highest rate and English and Vietnamese speakers trailing slightly behind. Cambodian speakers had a rate that was far below the other groups with a 30% difference compared to Spanish speakers. Ethnic subgroups showed statistically significant differences in this baseline measurement (Table 8a) with Other Asian or Pacific Islanders being the lowest performing group followed by Whites. Hispanics had the highest rate and Blacks were only

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

slightly lower than the highest performing group.

Sacramento: The baseline rate for SPDs in Sacramento county was 39.6% and was statistically significantly lower than the Non-SPD rate of 60.5% (Table 2). A statistically significant difference between age groups was seen in Sacramento county (Table 4a) with cervical cancer screening rates decreasing with increasing age. Statistically significant differences between language categories was seen in this county (Table 6a) with Hmong speakers having a rate of nearly 15% lower than English speakers. No statistically significant differences were seen between ethnic groups (Table 8a).

San Diego: The baseline rate for SPDs in San Diego county was 42.1% and was statistically significantly lower than the Non-SPD rate of 54% (Table 2). No statistically significant differences were seen between age groups in San Diego county (Table 4b). However, the rates demonstrated a decrease in cervical cancer screening rates with increasing age. No statistically significant differences were seen in San Diego county between language (Table 6b) or ethnic subgroups (Table 8b).

Stanislaus: The baseline rate for SPDs in Stanislaus county was 44.7% and was statistically significantly lower than the Non-SPD rate of 60.1% (Table 2). No statistically significant differences were seen between age groups in Stanislaus county (Table 4b). However, the rates demonstrated a decrease in cervical cancer screening rates with increasing age. No statistically significant differences were seen in Stanislaus county between language (Table 6b) or ethnic subgroups (Table 8b).

Tulare: The baseline rate for SPDs in Tulare county was 40.6% and was statistically significantly lower than the Non-SPD rate of 66.1% (Table 2). No statistically significant differences were seen between age groups in Stanislaus county (Table 4b). However, the rates demonstrated a decrease in cervical cancer screening rates with increasing age. No statistically significant differences were seen in Stanislaus county between language (Table 6b) or ethnic subgroups (Table 8b).

All County: The baseline 'All County' rate for SPDs was 47.5% and was statistically significantly lower than the Non-SPD rate of 61.4% (Table 2). A statistically significant difference between age groups was seen (Table 4b) with cervical cancer screening rates decreasing with increasing age. Statistically significant differences between language categories were seen (Table 6b) with Spanish and Vietnamese speakers having the highest rates and English speakers about 10% lower than the groups with the highest rates. The lowest rates were found for Cambodian and Hmong speakers. Ethnic subgroups showed statistically significant differences in this baseline measurement (Table 84b) with lowest rates being observed for Other Asian/Pacific Islander, Alaskan Native/American Indian, and White ethnicities as compared to Blacks and Hispanics.

Baseline to Remeasurement 1:

Fresno: The goal for the Remeasurement 1 was to increase the 'All Counties' SPD rate as well as each of the seven individual counties' SPD rates by 1% comparing MY2009 and MY2010. This goal was met for the SPD populations in Fresno county with a statistically significant increase of over 5% (Table 3). Compliance in this county decreased with age in MY2010 (p<0.0001) and although there were no statistically significant increases in MY2010 compared to MY2009 when looking across the three age strata in Fresno county, there were increases within each group, ranging from 4% to 7% (Table 4a). Although in MY2010 Hmong speakers had lower rates than any other language group in Fresno county (p<0.0001), the rate increased by nearly 10% compared to MY2009, although not statistically significantly. Also, the rates for Spanish speakers increased by nearly 11%, although not statistically significantly (Table 6a). Increases in Fresno were seen in each of the applicable ethnic subgroups, with increases ranging from 3.6% in the Black population to 6.8% in the 'Hispanic' ethnic subgroup. The CCS SPD rate for the white ethnic subgroup was the lowest in MY2010 compared to those of Black or Hispanic ethnicity (p<0.0001)

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

(Table 8a).

Kern: The goal of a 1% increase was not realized in Kern county with an increase of only 0.6% (Table 3). Compliance in this county decreased with age in MY2010, although not statistically significantly, and there were no statistically significant changes from MY2009 to MY2010 in any of the age categories with the largest being a 2.6% increase in the 56-64 year olds (Table 4a). The Spanish speaking SPD subpopulation saw a non-statistically significant decrease in the CCS rate by over 7%, although not statistically significant (Table 6a). There were no statistically significant differences found between ethnicity groups in Kern county and no statistically significant changes were seen in any ethnic subgroup in this county. However, the CCS SPD rate increased by nearly 6% in black ethnic subgroup (Table 8a).

Los Angeles: The goal of a 1% increase was not realized in Los Angeles county with a non-significant decrease of 0.3% (Table 3). Compliance in this county decreased with age in MY 2010 (p<0.0001) and there were no statistically significant changes within any of the age categories with the largest being a 2% decrease in the 24-40 year olds (Table 4a). In MY2010, Cambodian speakers had the lowest CCS rate among SPDs in Los Angeles county, while Spanish speaker had the highest (p<0.0001). There were no statistically significant changes in any of the language subgroups although the Vietnamese speakers had a 13% increase, bearing in mind the MY2010 results for this language subgroup were comprised of less than 50 eligible study member, so no valid significance testing was done (Table 6a). There were no notable changes in any of the ethnic subgroups in LA county, and the Other Asian/Pacific Islander and White ethnic groups remain at the bottom when compared to Blacks and Hispanics (p<0.0001) (Table 8a).

Sacramento: The goal of a 1% increase was not realized in Sacramento county with a non-significant decrease of 2.2% (Table 3). Compliance in Sacramento county decreased with age in MY2010 (p=0.0071). There was a decrease of nearly 9% in the 24-40 year olds and a decrease of 2.5% in the 56-64 year olds (Table 4a). Russian speakers were found to have the lowest CCS rate in MY 2010 (p=0.0084) and although English speakers remained the most compliant when compared to Hmong and Russian speakers, there was a decrease of 6.1% in the CCS SPD rate for English speakers while Hmong speakers had an increase of over 7%, although both of these changes were not statistically significant (Table 6a). The only ethnic subgroup that had a statistically significant change in the CCS SPD population was those of White ethnicity in Sacramento county, with a 9% decrease compared to MY2009, and the MY2010 rate for whites was one of the lowest when compared to the other ethnic groups in this county (p=0.0004). However, there was nearly a 5% increase for the 'Other Asian/Pacific Islanders' ethnic group, although not statistically significant (Table 8a).

San Diego: The goal of a 1% increase was met for the SPD populations in San Diego county with a 1.3% increase (Table 3). Compliance in this county decreased with age in MY2010 (p=0.04) and there were no statistically significant changes in any of the age categories with the largest being a nearly 5% increase in the 24-40 year olds (Table 4b). There were no notable changes in any of the language subgroups (Table 6b) or ethnic subgroups (Table 8b) in this county.

Stanislaus: The goal of a 1% increase was met for the SPD populations in Stanislaus county with a 3.2% increase (Table 3). Compliance in this county decreased with age in MY2010, although not statistically significantly, and there were no statistically significant changes in any of the age categories, although the rate for 41-55 Year olds increased by nearly 5% and the rate for 56-64 Year olds increased by 7% (Table 4b). There were no notable changes in any of the language subgroups in this county (Table 6b), and although no changes were statistically significant in any of the ethnic subgroups, both rates for Whites and Hispanics increased by 5% (Table 8b).

Tulare: The goal of a 1% increase was met for the SPD populations in Tulare county with a 5.9% increase (Table 3). Cervical cancer screening rates are shown to decrease with increasing age in Tulare county in MY2010, although not statistically significantly, and although not statistically significant, there were increases in each age group with an increase

H. Activity VIIIb. Interpretation of study results: Describe the results of the statistical analysis, interpret the findings, and compare and discuss results/changes from measurement period to measurement period. Discuss the successfulness of the study and indicate follow-up activities. Identify any factors that could influence the measurement or validity of the findings.

of over 11% in the 24-40 year olds (Table 4b). The overall results for Tulare counties mainly reflect English speakers since English was the only language subgroup consisting of 50 or greater and this language group had a 7.5% increase in the MY2010 compared to the MY2009 (Table 6b). CCS SPD rates in this county increased in the Hispanic and White ethnic subgroups by 4% and 9%, respectively, although the changes were not statistically significant (Table 8b).

All County: The goal of a 1% increase was not realized in the 'All Counties' rate with a non-statistically significant decrease of 0.3% (Table 3). Cervical cancer screening rates are shown to decrease with increasing age at the 'All County' level in MY2010 (p<0.0001) with negligible change in any of the age subgroups when comparing the MY2009 and MY2010 rates (Table 4b). The 'All Counties' results demonstrate that Spanish and Vietnamese speakers had the highest rates, and the rate for English speakers was about 10% lower than the Spanish speakers (p<0.0001). The lowest rates were observed for Cambodian, Hmong, and Russian speakers. No statistically significant differences were seen within language categories between measurement years (Table 6b). In MY2010, the lowest rates continue to be observed in the 'All Counties' rates for White and Other Asian/Pacific Islander ethnicities as compared to Blacks and Hispanics (p<0.0001), while the rate for Alaskan Native/American Indian Indians became closer to the rates for Blacks and Hispanics, increasing in MY2010 by over 4%, although not statistically significantly. (Table 8b)

Remeasurement 1 to Remeasurement 2:

Kern

Los Angeles

Sacramento

San Diego

Stanislaus

Tulare

All County

I. Activity IX: Report improvement. Enter results for each study indicator, including benchmarks and statistical testing with complete p values, and statistical significance.

Evidence of "real" improvement

The data extraction for the pre-baseline results occurred prior to the end of the 2009 Measurement Year and prior to the standard 90-day claims data run-out period that is considered sufficient time for claims data collection and reporting to be mostly complete. Therefore, the pre-baseline measurement is based on data that is considered to be mostly complete from January 1, 2009 through August 31, 2009. These results are not final and are therefore not comparable to any finalized results.

The official baseline results were reported in 2010 based on the final RY2010 HEDIS® data prepared by the Health Net HEDIS® team.

I. Activity IX: Report improvement. Enter results for each study indicator, including benchmarks and statistical testing with complete p values, and statistical significance.

Quantifiable Measure No. 1: The percentage of eligible Medi-Cal SPD women who received one or more Pap tests during the measurement year or the two years prior to the measurement year

| Time Period Measurement Covers | Baseline Project Indicator Measurement | Numerator | Denominator | Rate or Results | Industry Benchmark | Statistical Test Significance and p value |
|---|--|-----------|-------------|-----------------|---|---|
| Pre-Baseline Measurement Period: January 1-November 30, 2009 | Pre-Baseline The percentage of eligible Medi-Cal SPD women who received one or more Pap tests during the measurement year or the two years prior to the measurement year | | | | Industry Benchmark: N/A Goal: 2% improvement in 'All County' and individual county administrative rates from Baseline to Remeasurement 2 with 1% improvement for each Remeasurement 1 & 2 in 'All County' and individual county administrative rates | N/A |
| | County Name: Fresno | 163 | 483 | 33.75 | | |
| | County Name: Kern | 218 | 681 | 32.01 | | |
| | County Name: LA | 2022 | 5006 | 40.39 | | |
| | County Name: Sacramento | 188 | 614 | 30.62 | | |
| | County Name: San Diego | 105 | 334 | 31.44 | | |
| | County Name: Stanislaus | 100 | 257 | 38.91 | | |
| | County Name: Tulare | 54 | 152 | 35.53 | | |
| | All County | 2850 | 7527 | 37.88 | | |
| Baseline: Measurement HEDIS® RY 2010 Measurement Period: January 1 2009 through December 31, 2009 | Baseline: The percentage of eligible Medi-Cal SPD women who received one or more Pap tests during the measurement year or the two years prior to the measurement year | | | | Goal: 2% improvement in 'All County' and individual county Administrative rates from Baseline to Remeasurement 2 with 1% improvement for each Remeasurement 1 & 2 in 'All County' and | N/A |

I. Activity IX: Report improvement. Enter results for each study indicator, including benchmarks and statistical testing with complete p values, and statistical significance.

Quantifiable Measure No. 1: The percentage of eligible Medi-Cal SPD women who received one or more Pap tests during the measurement year or the two years prior to the measurement year

| Time Period Measurement Covers | Baseline Project Indicator Measurement | Numerator | Denominator | Rate or Results | Industry Benchmark | Statistical Test Significance and p value |
|--|---|-----------|-------------|-----------------|---|---|
| | | | | | individual county administrative rates | |
| | County Name: Fresno | 197 | 490 | 40.2 | | |
| | County Name: Kern | 291 | 711 | 40.9 | | |
| | County Name: LA | 2,701 | 5,320 | 50.8 | | |
| | County Name: Sacramento | 256 | 647 | 39.6 | | |
| | County Name: San Diego | 159 | 378 | 42.1 | | |
| | County Name: Stanislaus | 123 | 275 | 44.7 | | |
| | County Name: Tulare | 65 | 160 | 40.6 | | |
| | All County | 3,792 | 7,981 | 47.5 | | |
| Remeasurement 1: Measurement HEDIS® RY 2011 Measurement Period: January 1 2010 through December 31, 2010 | Remeasurement 1 The percentage of eligible Medi-Cal SPD women who received one or more Pap tests during the measurement year or the two years prior to the measurement year | | | | Minimum Performance Level (MPL): 61.0 Goal: 1% improvement for Remeasurement 1 in 'All County' and individual county administrative rates compared to Baseline | Adjusted Chi-Square Test of Proportions with an alpha of 0.05 |
| | County Name: Fresno | 657 | 1,445 | 45.5 | The goal of a 1% | 0.0483 |
| | County Name: Kern | 275 | 663 | 41.5 | increase was met in | 0.8791 |
| | County Name: LA County Name: Sacramento | 2,685 | 5,320 | 50.5 | Fresno, San Diego, Stanislaus, | 0.7712 |
| | | 393 | 1,051 | 37.4 | and Tulare counties, | 0.3987 |
| | County Name: San Diego | 139 | 320 | 43.4 | but was not met in | 0.7727 |
| | County Name: Stanislaus | 140 | 292 | 47.9 | | 0.4942 |

I. Activity IX: Report improvement. Enter results for each study indicator, including benchmarks and statistical testing with complete p values, and statistical significance.

Quantifiable Measure No. 1: The percentage of eligible Medi-Cal SPD women who received one or more Pap tests during the measurement year or the two years prior to the measurement year

| Time Period Measurement Covers | Baseline Project Indicator Measurement | Numerator | Denominator | Rate or Results | Industry Benchmark | Statistical Test Significance and p value |
|-----------------------------------|---|-----------|-------------|-----------------|-------------------------|---|
| | County Name: Tulare | 94 | 202 | 46.5 | Kern, Los Angeles, | 0.3084 |
| | All County | 4,383 | 9,293 | 47.2 | Sacramento, or the 'All | 0.6586 |
| | | | | | County' rate. | |

Describe any demonstration of meaningful change in performance observed from Baseline and each measurement period (e.g., Baseline to Remeasurement 1, Remeasurement 1 to Remeasurement 2, or Baseline to final Remeasurement) for each study indicator:

The goal for Remeasurement 1 was to increase the 'All Counties' SPD rate as well as each of the seven individual counties' SPD rates by 1% comparing Baseline to Remeasurement 1. This goal was met for Fresno, San Diego, Stanislaus and Tulare counties. However, no meaningful improvement was observed in the 'All County' rate or within the individual counties of Kern, Los Angeles, and Sacramento.

I. Activity IX: Report improvement. Enter results for each study indicator, including benchmarks and statistical testing with complete p values, and statistical significance.

Ouantifiable Measure 2:

| Time Period Measurement Covers | Baseline Project Indicator Measurement | Numerator | Denominator | Rate or Results | Industry Benchmark | Statistical Test Significance and p value |
|-----------------------------------|---|-----------|-------------|-----------------|-----------------------|---|
| | Remeasurement 2 | | | | | |
| | County Name: Kern | | | | | |
| | County Name: LA | | | | | |
| | County Name: Sacramento | | | | | |
| | County Name: San Diego | | | | | |
| | County Name: Stanislaus | | | | | |
| | County Name: Tulare | | | | | |
| | All County | | | | | |

J. Activity X: Describe sustained improvement. Describe any demonstrated improvement through repeated measurements over comparable time periods. Discuss any random, year-to-year variations, population changes, sampling errors, or statistically significant declines that may have occurred during the Remeasurement process

Sustained improvement:

Baseline to Remeasurement 1

Fresno: There was a statistically significant increase in Study Indicator 1 from baseline to Remeasurement 1 of 5.3% in Fresno county. The size of the SPD population eligible to be included in the denominator for Study Indicator 1 increased nearly threefold from MY2009 to MY2010. This substantial change in the population in this county as well as the interventions described in activity VII may have had an impact on increasing the proportion of SPD members who received their Pap test to screen for cervical cancer in MY2010. Similarly, although these members are new to Health Net, these members may have the same providers. Consequently, continuity of care and service was not affected by the change in health plan membership.

Kern: There was a 0.6% improvement observed in Kern county however the goal of 1% improvement from Baseline to Remeasurement 1 was not met. Based on age, language and ethnicity analysis and further barriers identified, interventions will be proposed, evaluated and implemented with the goal of achieving 2% sustained improvement from baseline to Remeasurement 2 in Kern County.

Los Angeles: There was a 0.3% decrease observed in Los Angeles county and the goal of 1% improvement from Baseline to Remeasurement 1 was not met. Based on age, language and ethnicity analysis and other barriers identified, interventions will be proposed, evaluated and implemented with the goal of achieving 2% sustained improvement from baseline to Remeasurement 2 in Los Angeles County.

Sacramento: There was a 2.2% decrease observed in Sacramento county and the goal of 1% improvement from Baseline to Remeasurement 1 was not met. Based on age, language and ethnicity analysis and other barriers identified, interventions will be proposed, evaluated and implemented with the goal of achieving 2% sustained improvement from baseline to Remeasurement 2 in Sacramento County.

San Diego: The goal of a 1% increase was met for the SPD population in San Diego county with a 1.3% increase. The interventions described in activity VII may have had an impact on increasing the proportion of SPD members who received their Pap test to screen for cervical cancer in MY2010.

Stanislaus: The goal of a 1% increase was met for the SPD population in Stanislaus county with a 3.2% increase. The interventions described in activity VII may have had an impact on increasing the proportion of SPD members who received their Pap test to screen for cervical cancer in MY2010.

Tulare: The goal of a 1% increase was met for the SPD populations in Tulare county with a 5.9% increase. The interventions described in activity VII may have had an impact on increasing the proportion of SPD members who received their Pap test to screen for cervical cancer in MY2010.

All County: There was no improvement observed in the 'All Counties' rate with a non-statistically significant decrease of 0.3% from Baseline to Remeasurement 1. Based on age, language and ethnicity analysis and other barriers identified, interventions will be proposed, evaluated and implemented with the goal of achieving 2% sustained improvement from baseline to Remeasurement 2.



Medi-Cal Facility Site Review/Medical Records Review 2011

Activity Summary

Name/Title: Carol Spencer, RN, CPHQ, Manager QI State Health Programs

Departments Involved: QI, Medi-Cal Facility Site Review

Date: September 29, 2011

Purpose of Activity:

This report displays completed activity and results of the DHCS required PCP Facility Site (FSR) and Medical Record Reviews (MRR) for all contracted Medi-Cal counties using the Medi-Cal Managed Care Division (MMCD) Policy Letter 02-02 FSR/MRR audit tool. The results are analyzed for the purpose of monitoring and improving the performance of PCPs against DHCS and Health Net standards.

Threshold(s)/Benchmark(s):

MMCD Policy Letter 02-02 requires FSR/MRR for initial sites with a periodicity of every 3 years. The FSR/MRR passing score is 80%. Corrective actions must meet DHCS time frames.

Methodology/Sampling/Time Period:

Data are extracted from the FSR database; data are reviewed, aggregated, analyzed and reported.

The time period reflected in this FSR and MRR activity report is for 1st and 2nd quarters 2011. For comparisons, data from previous quarters/years are included. It includes sites reviewed by Health Net for all counties: Los Angeles, Fresno, Tulare, Sacramento, San Diego, Kern, San Bernardino, Orange, Riverside, Stanislaus, Kings and Madera.

Results/Quantitative Analysis:

Health Net completed 79 Facility Site Reviews (FSR) and 60 Medical Record Reviews (MRR) (minimum of 10 charts per site are reviewed for a total of 600 records reviewed) in the first two quarters of 2011. Corrective Action Plans (CAPs) are required for scores below 90% and for deficiencies in any Critical Elements (CE); CAPs must be approved and corrections verified. 45% of FSRs and MRRs required on-site focused reviews to verify corrections.

- ◆ The overall mean FSR score (all counties) was 97% for the first two quarters of 2011. (Figure 1)
- ◆ The overall mean MRR score (all counties) was 91% for the first two quarters of 2011. (Figure 2)

Figure 1

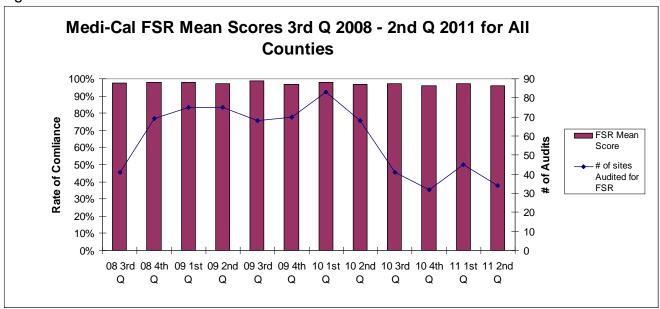
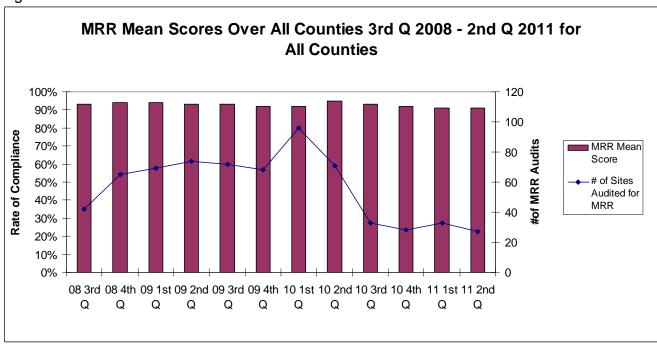


Figure 2



Medical Record Review (MRR) for Preventive Care

The MRR results are presented in over all counties' mean scores for the 6 sections (Format, Documentation, Continuity/Coordination, Pediatric Preventive Care, Adult Preventive Care and OB Preventive care).

- The Adult Preventive Care mean scores over all counties for the first two quarters of 2011 were 79%. (Figure 3)
- ◆ The Pediatric Preventive Care mean scores over all counties for the first two quarters of 2011 were 85%. (Figure 4)

Figure 3

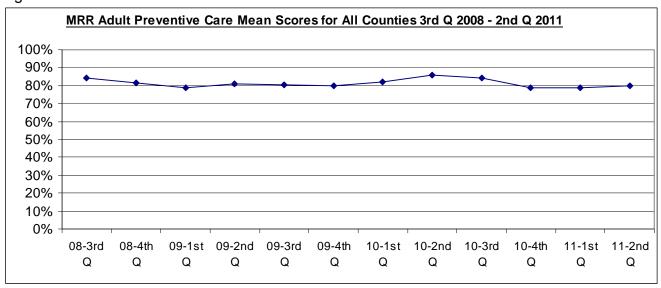
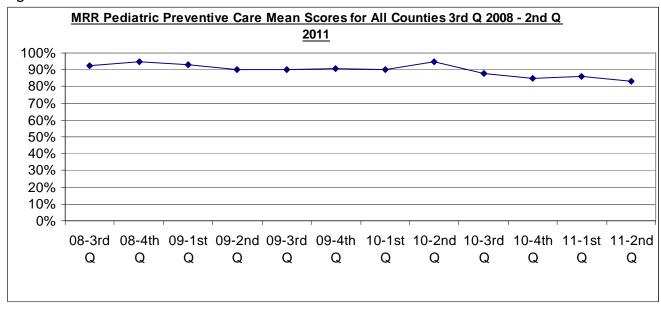


Figure 4



Specific MRR Criteria: (Table 1)

- ◆ Individual Health Education Behavioral Assessment (IHEBA) over all counties continued to vary significantly quarter to quarter since different PCPs are reviewed and the volume is low. The Adult IHEBA mean completion rate was 82% for the first two quarters of 2011. Pediatric IHEBA mean completion rate was 94% for the first two quarters of 2011. Some PCPs refuse to use the IHEBA, while others do not document review and interventions as indicated for the IHEBA.
- ◆ Pediatric Initial Health Assessment (IHA) compliance scores overall counties were 89%. Adult IHA scores averaged 96% for the first two quarters of 2011.
- ◆ Documentation of Interpreter Services and Primary Language criteria demonstrated a mean rate of 100% and 89% respectively for the first two quarters of 2011.

Table 1

| Quarter / Year | Interpreter Services | Trained Interpreters | Primary Language | Ped IHA | Ped IHEBA | Ped Dental Assessment | Adult IHA | Adult IHEBA |
|------------------------|-------------------------|----------------------|---------------------|------------|--------------|--------------------------|--------------|----------------|
| 3rd Q 2008 | 100% | 90% | 98% | 100% | 88% | 91% | 100% | 80% |
| 4th Q 2008 | 100% | 97% | 79% | 100% | 97% | 88% | 100% | 88% |
| 1st Q 2009 | 100% | 91% | 85% | 100% | 92% | 89% | 96% | 93% |
| 2nd Q 2009 | 99% | 95% | 77% | 100% | 82% | 87% | 100% | 86% |
| 3rd Q 2009 | 100% | 100% | 92% | 98% | 95% | 89% | 93% | 90% |
| 4th Q 2009 | 100% | 91% | 88% | 100% | 97% | 80% | 100% | 97% |
| 1 st Q 2010 | 100% | 95% | 90% | 100% | 98% | 88% | 98% | 93% |
| 2 nd Q 2010 | 100% | 93% | 97% | 100% | 100% | 86% | 100% | 88% |
| 3 rd Q 2010 | 100% | 92% | 100% | 100% | 100% | 88% | 100% | 86% |
| 4 th Q 2010 | 100% | 94% | 96% | 100% | 88% | 81% | 100% | 94% |
| 1 st Q 2011 | 100% | 95% | 93% | 88% | 100% | 88% | 92% | 91% |
| 2 nd Q 2011 | 100% | 97% | 83% | 91% | 86% | 90% | 100% | 70% |

Corrective Action Plans:

Corrective Action Plans (CAPs) have 3 components, Critical Element (CE) CAP, FSR CAP and MRR CAP. CE CAPs are due in 10 business days from the date of the FSR. FSR and MRR CAPs are due in 45 calendar days from the date of the review.

PCPs with FSR scores greater than or equal to 90% with no Critical Element (CE) deficiencies and MRRs greater than or equal to 90% did not have to submit a CAP (exempt pass).

Below are the exempt pass rates (Table 2).

Table 2
No CAP Required (Exempt Pass):

| CAP | 2008 3rd Q | 2008 4th Q | 2009 1st Q | 2009 2nd Q | 2009 3rd Q | 2009 4th Q | 2010 1 st Q | 2010 2 nd Q | 2010 3 rd Q | 2010 4 th Q | 2011 1 st Q | 2011 2 nd Q |
|------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------------------|---------------------------|---------------------------|---------------------------|---------------------------|---------------------------|
| FSR- CE | 76% | 78% | 79% | 79% | 97% | 74% | 75% | 76% | 97% | 94% | 67% | 62% |
| FSR | 71% | 75% | 69% | 57% | 87% | 67% | 66% | 63% | 56% | 60% | 62% | 35% |
| MRR | 79% | 72% | 81% | 78% | 83% | 76% | 79% | 83% | 85% | 78% | 82% | 63% |

For all the counties, the CE CAP submission compliance rate within 10 business days was 100% in the first two quarters of 2011. FSR CAP compliance within 45 days of the FSR data mean rate was 97%. MRR CAP compliance within 45 days for MRR data had the mean rate was 98%. Any PCPs that were not on track to meet timelines rates were addressed through technical assistance, for office staff at the non-compliant sites, as well as a focused onsite review of medical records.

Physical Accessibility Review Survey (PARS):

PARS reviews provide access level information to health plan provider directories. A provider site is considered to have **Basic** level access when it demonstrates facility site access for the members with disabilities to parking, building, elevator, doctor's office, exam room and restroom. To meet Basic level access, all Critical Elements (29) must be met. If a provider site has deficiencies in 1 or more Critical Elements, the level of access is **Limited**. PARS reviews are performed on a three year periodic cycle, unless the provider site has made access improvements or at the request of the provider site. The new PARS audit tool was implemented in February 2011. In the first two quarters of 2011, Health Net has completed 32 PARS reviews for all counties, with 28% designated as having Basic level access. As part of the PARS, Accessibility indicators are defined and will be included in the Health Net provider directory and member web portal to help members select their provider that meets any special needs. The Accessibility Indicators are: Parking, Exterior Building, Interior Building, Exam Room, Restroom, electronic Exam Table and accessible Weight Scale. No corrective actions are required.

Interim Reviews:

88 Interim Reviews were completed during the first two quarters of 2011. An Interim Review is a DHCS required monitoring activity to evaluate the PCP site between the 3-year periodic FSR cycle; the minimum review includes the 9 Critical Elements.

FSR/MRR Educational Trainings for Provider Sites:

Certified Site Review Nurses may provide educational trainings prior to the actual FSR/MRR evaluation. Educational Trainings allow provider sites to become familiar with the DHCS regulations and FSR/MRR processes. For the first two quarters of 2011, Certified Site Review Nurses performed 133 educational trainings.

Grievances about Facilities:

Certified Site Review Nurses conduct onsite inspections for grievances filed with Health Net that are related to facilities and access. During the first two quarters of 2011, 32 grievance site visits were completed; only 4 sites were noted to have the grievance substantiated requiring a corrective action plan. These review results are submitted to the Appeals and Grievance and Credentialing Departments.

Delegation Oversight:

Health Net delegates FSR/MRR to Molina Health Care in Los Angeles County. Comparison of the scores between Health Net and Molina demonstrate similar outcomes for FSR and MRR.

◆ The inter-rater reliability for FSR and MRRs in Los Angeles County sites reviewed by Health Net, Molina was within 3% variance (threshold is 10%). All RN Reviewers are also required to participate in the DHCS sponsored Statewide MRR inter-rater reliability annual process.

Barrier Analysis:

- Comparisons of data show trends only since the FSRs and MRRs are for different PCPs each quarter.
- Audit data show low numbers for audits for some counties when reported for each quarter thus skewing rates.
- Data sharing among collaborating health plans requires ongoing data management for accuracy of addresses, status, and release for Medi-Cal in Health Net systems to open PCPs for member assignment.
- Reporting of specific criteria is only available for Health Net due to non-electronic systems of data collection and limited resources of the health plans.
- PCPs refuse to use the IHEBA stating it is not helpful, it is time consuming and is not culturally sensitive to name a few.

Interventions Already Taken:

- Interim reviews (between 3 year periodic cycle reviews) are completed as required by MMCD 02-02 on all PCP sites to monitor continued compliance of critical elements and maintenance of corrected deficiencies.
- ◆ Completed CAP follow-up collaboratively with participating health plans.
- Pre-audit education for FSR and MRR is offered to PCPs.

- ◆ To assist compliance to the DHCS FSR/MRR requirements, a pre-audit packet of materials is given to the PCP prior to the scheduled FSR/MRR.
- Preventive care information for children, teens and adults was provided for all provider sites statewide as part of the PCP outreach to improve quality of care.
- ♦ All Facility Site Review RNs participated in the DHCS training for FSR and the MRR interrater reliability annual process.

Table 3 FSR County Scores 3rd Q 2008 – 2nd Q 2011

| County | 08 3rd Q | 08 4th Q | 09 1st Q | 09 2nd Q | 09 3 rd Q | 09 4 th Q | 10 1 st Q | 10 2 nd Q | 10 3 rd Q | 10 4 th Q | 11 1 st Q | 11 2 nd Q |
|----------------------------------|--------------|--------------|--------------|-----------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Los Angeles | 97% | 99% | 97% | 97% | 99% | 97% | 97% | 97% | 96% | 97% | 97% | 96% |
| Riverside | 97% | no audits | 95% | 95% | no audits | 98% | 100% | 98% | 100% | no audits | 95% | 94% |
| San Bernardino | 95% | no audits | 97% | 91% | 99% | 91% | 98% | 92% | 99% | 93% | 96% | 98% |
| San Diego | 99% | 99% | 100% | 100% | 100% | 100% | 99% | 96% | 96% | no audits | 97% | 95% |
| Fresno | 98% | 94% | 99% | 96% | 98% | 98% | 99% | 97% | 96% | 97% | 96% | 92% |
| Tulare | no audits | 100% | 99% | 95% | 98% | 96% | 99% | no audits | no audits | no audits | 91% | 99% |
| Sacramento | 100% | 96% | 99% | 99% | 99% | 96% | 97% | 98% | 100% | 95% | 100% | 91% |
| Kern | 96% | 100% | no audits | 100% | 98% | 100% | 99% | no audits | 93% | no audits | 99% | 99% |
| Stanislaus | no audits | 99% | 97% | 99% | 100% | 97% | 92% | 98% | 93% | no audits | 100% | 95% |
| Orange | 100% | 96% | 100% | 99% | no audits | 95% | 99% | 100% | no audits | no audits | 100% | 100% |
| Kings/Madera | no audits | no audits | no audits | no audits | no audits | no audits | no audits | no audits | 97% | 92% | 100% | no audits |
| FSR Mean Score | 98% | 98% | 98% | 97% | 99% | 97% | 98% | 97% | 97% | 96% | 97% | 96% |
| # of sites Audited for FSR | 41 | 69 | <i>7</i> 5 | 75 | 68 | 70 | 83 | 68 | 41 | 32 | 45 | 34 |

Table 4 Number of Sites Audited

| County | 2008 # of Sites Audited 3rd Q | 2008 # of Sites Audited 4th Q | 2009 # of Sites Audited 1st Q | 2009 # of Sites Audited 2nd Q | 2009 # of Sites Audited 3rd Q | 2009 # of Sites Audited 4th Q | 2010 # of Sites Audited 1 st Q | 2010 # of Sites Audited 2 nd Q | 2010 # of Sites Audited 3rd Q | 2010 # of Sites Audited 4th Q | 2011 # of Sites Audited 1 st Q | 2011 # of Sites Audited 2 nd Q |
|------------------------|--|--|--|--|--|--|--|--|--|--|--|--|
| Los Angeles | 21 | 47 | 34 | 36 | 29 | 45 | 41 | 42 | 18 | 23 | 28 | 20 |
| Riverside | 1 | no audits | 1 | 1 | no audits | 1 | 1 | 1 | 1 | no audits | 2 | 1 |
| San Bernardino | 5 | no audits | 6 | 2 | 2 | 2 | 4 | 3 | 1 | 1 | 1 | 1 |
| San Diego | 7 | 1 | 7 | 5 | 12 | 4 | 6 | 3 | 9 | no audits | 3 | 1 |
| Fresno | 2 | 4 | 12 | 9 | 12 | 9 | 7 | 12 | 1 | 2 | 3 | 2 |
| Tulare | no audits | 4 | 3 | 7 | 4 | 2 | 3 | no audits | no audits | no audits | 2 | 3 |
| Sacramento | 1 | 2 | 6 | 4 | 5 | 4 | 13 | 2 | 6 | 5 | 2 | 2 |
| Kern | 2 | 1 | no audits | 5 | 3 | 1 | 1 | no audits | 1 | no audits | 1 | 2 |
| Stanislaus | no audits | 7 | 5 | 3 | 1 | 1 | 5 | 4 | 1 | no audits | 1 | 1 |
| Orange | 2 | 3 | 1 | 3 | no audits | 1 | 2 | 1 | no audits | no audits | 1 | 1 |
| Kings/Madera | no audits | no audits | 3 | 1 | 1 | no audits |
| Overall # of Audits | 41 | 69 | 75 | 75 | 68 | 70 | 83 | 68 | 41 | 32 | 45 | 31 |

Table 5 Adult Preventive Care Criterion Rates

| | 08-3rd | 08-4th | 09-1st | 09-2nd | 09-3rd | 09-4th | 10-1 st | 10-2 nd | 10- 3 rd | 10- 4 th | 11 – 1 st | 11 – 2 nd |
|-----------------|---------|---------|---------|---------|---------|---------|--------------------|--------------------|---------------------|---------------------|----------------------|----------------------|
| County | Q | Q | Q | Q | Q | Q | Q | Q | Q | Q | Q | Q |
| Los Angeles | 83% | 81% | 80% | 85% | 80% | 80% | 78% | 81% | 77% | 79% | 78% | 77% |
| Riverside | 92% | no data | no data | no data | no data | 79% | 86% | no data | no data | no data | no data | 78% |
| San Bernardino | 85% | no data | 81% | 98% | 84% | 100% | 88% | 74% | 98% | 90% | 91% | 91% |
| San Diego | 69% | no data | 78% | 87% | 88% | 85% | 97% | 93% | 92% | no data | 94% | NA |
| Fresno | 77% | 74% | 87% | 86% | 66% | 75% | 84% | 85% | 80% | 91% | 93% | no data |
| Tulare | 79% | 87% | 81% | 84% | 89% | 100% | 87% | no data | no data | no data | no data | 77% |
| Sacramento | 82% | 84% | 76% | 68% | 83% | 70% | 77% | no data | no data | 71% | 100% | no data |
| Kern | 93% | 77% | no data | 82% | 86% | 87% | 56% | no data | no data | no data | no data | 85% |
| Stanislaus | no data | 82% | 70% | 56% | 74% | 88% | 87% | 85% | 80% | no data | no data | NA |
| Orange | 98% | 86% | no data | 81% | 83% | 60% | 83% | 99% | 88% | no data | no data | 100% |
| Kings/Madera | no data | no data | no data | no data | no data | 76% | no data |
| Overall Average | 84% | 82% | 79% | 81% | 80% | 80% | 82% | 86% | 84% | 79% | 79% | 80% |

Table 6 Pediatric Preventive Care Criterion Rates

| County | 08-3rd Q | 08-4th Q | 09-1st Q | 09-2nd Q | 09-3rd Q | 09- 4th Q | 10-1 st Q | 10-2 nd Q | 10- 3 rd Q | 10–4 th Q | 11– st Q | 11–2 nd Q |
|--------------------|-------------|-------------|-------------|-------------|-------------|--------------|-------------------------|-------------------------|--------------------------|-------------------------|------------------------|-------------------------|
| Los Angeles | 90% | 90% | 88% | 86% | 90% | 87% | 79% | 87% | 87% | 88% | 83% | 79% |
| Riverside | 89% | no data | no data | no data | 95% | 100% | 84% | 100% | 98% | no data | no data | NA |
| San Bernardino | 86% | no data | 86% | 98% | 84% | 100% | 96% | no data | 100% | 79% | 91% | 71% |
| San Diego | 86% | 100% | 94% | 91% | 95% | 93% | 95% | 93% | 81% | 77% | 74% | 79% |
| Fresno | 94% | 83% | 98% | 91% | 87% | 95% | 97% | 97% | 94% | 93% | 100% | no data |
| Tulare | 98% | 95% | 95% | 87% | 92% | 91% | 82% | no data | no data | no data | no data | 91% |
| Sacramento | 92% | no data | 100% | 88% | 92% | 90% | 99% | 100% | 100% | 78% | 100% | no data |
| Kern | 100% | 100% | no data | 92% | 78% | 100% | no data | no data | 98% | no data | no data | 100% |
| Stanislaus | no data | 99% | 89% | 90% | 100% | 93% | 97% | 100% | 91% | no data | no data | 81% |
| Orange | 97% | 97% | no data | no data | no data | 91% | 79% | 90% | 98% | no data | no data | 100% |
| Kings/Madera | no data | no data | no data | no data | no data | no data | 96% | no data |
| Overall Average | 92% | 95% | 93% | 90% | 90% | 91% | 90% | 95% | 88% | 85% | 86% | 83% |

Table 7
MRR Overall Counties-Mean Section Scores 3rd Q 2008 – 2nd Q 2011

| County | 08-3rd Q | 08-4th Q | 09-1st Q | 09-2nd Q | 09-3rd Q | 09-4th Q | 10-1 st Q | 10-2 nd Q | 10-3 rd Q | 10-4 th Q | 11-1 st Q | 11-2 nd Q |
|--------------------|----------|----------|----------|----------|----------|----------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Los Angeles | 90% | 90% | 91% | 92% | 92% | 90% | 90% | 91% | 88% | 91% | 90% | 89% |
| Riverside | 89% | no data | no data | no data | 98% | 94% | 95% | 98% | 99% | no data | no data | 93% |
| San Bernardino | 86% | no data | 93% | 97% | 93% | 99% | 94% | 90% | 100% | 93% | 94% | 90% |
| San Diego | 86% | 100% | 95% | 96% | 97% | 96% | 98% | 96% | 96% | 92% | 94% | 92% |
| Fresno | 94% | 83% | 94% | 91% | 90% | 93% | 93% | 94% | 93% | 96% | 95% | no data |
| Tulare | 98% | 95% | 92% | 92% | 93% | 93% | 92% | no data | no data | no data | no data | 91% |
| Sacramento | 92% | no data | 96% | 91% | 95% | 94% | 94% | 97% | 99% | 92% | 100% | no data |
| Kern | 100% | 100% | no data | 94% | 88% | 96% | 78% | no data | 98% | no data | no data | 98% |
| Stanislaus | no data | 99% | 94% | 87% | 96% | 96% | 94% | 96% | 93% | no data | no data | 93% |
| Orange | 97% | 97% | no data | 94% | 87% | 83% | 91% | 94% | 96% | no data | no data | 99% |
| Kings/Madera | no data | no data | no data | no data | 93% | no data |
| Overall Average | 92% | 95% | 94% | 93% | 93% | 92% | 92% | 95% | 93% | 92% | 91% | 91% |

Table 8 Selected Criteria by County for 3rd Q 2010 to 2nd Q 2011

3RD QUARTER 2010

| County | Interpreter Services | Trained Interpreters | Primary Language | Pediatric IHA | Pediatric IHEBA | Ped Dental Assessment | Adult IHA | Adult IHEBA |
|----------------|-------------------------|-------------------------|---------------------|---------------|--------------------|--------------------------|-----------|-------------|
| Los Angeles | 100% | 83% | 100% | 100% | 100% | 78% | 100% | 100% |
| Riverside | 100% | 100% | 100% | 100% | 100% | 100% | | |
| San Bernardino | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 100% |
| San Diego | 100% | 100% | 100% | 100% | 100% | 83% | 100% | NA |
| Fresno | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 0% |
| Tulare | | | | | | | | |
| Sacramento | 100% | 100% | 100% | 100% | 100% | 100% | | |
| Kern | 100% | 100% | 100% | 100% | NA | 100% | | |
| Stanislaus | 100% | 100% | 100% | NA | NA | NA | 100% | NA |
| Orange | | | 100% | NA | 100% | 100% | NA | 100% |
| Kings/Madera | 100% | 100% | | | | | | |
| OVERALL | 100% | 92% | 100% | 100% | 100% | 88% | 100% | 86% |

4TH QUARTER 2010

| County | Interpreter Services | Trained Interpreters | Primary Language | Pediatric IHA | Pediatric IHEBA | Ped Dental Assessment | Adult IHA | Adult IHEBA |
|----------------|-------------------------|-------------------------|---------------------|---------------|--------------------|--------------------------|-----------|-------------|
| Los Angeles | 100% | 96% | 92% | 100% | 100% | 89% | 100% | 100% |
| Riverside | | | | | | | | |
| San Bernardino | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 100% |
| San Diego | | | 100% | NA | NA | 100% | 100% | 100% |
| Fresno | 100% | 100% | 100% | 100% | 0% | 100% | 100% | 50% |
| Tulare | | | | | | | | |
| Sacramento | 100% | 80% | 100% | 100% | 100% | 50% | 100% | 100% |
| Kern | | | | | | | | |
| Stanislaus | | | | | | | | |
| Orange | | | | | | | | |
| Kings/Madera | 100% | 100% | | | | | | |
| OVERALL | 100% | 94% | 96% | 100% | 88% | 81% | 100% | 94% |

1ST QUARTER 2011

| County | Interpreter Services | Trained Interpreters | Primary Language | Pediatric IHA | Pediatric IHEBA | Ped Dental Assessment | Adult IHA | Adult IHEBA |
|----------------|-------------------------|-------------------------|---------------------|---------------|--------------------|--------------------------|-----------|-------------|
| Los Angeles | 100% | 93% | 89% | 89% | 100% | 85% | 86% | 100% |
| Riverside | 100% | 100% | | | | | | |
| San Bernardino | 100% | 100% | 100% | 100% | 100% | 100% | 100% | NA |
| San Diego | 100% | 100% | 100% | 50% | 100% | 100% | 100% | NA |
| Fresno | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 50% |
| Tulare | 100% | 100% | | | | | | |
| Sacramento | 100% | 100% | 100% | 100% | 100% | 100% | NA | NA |
| Kern | 100% | 100% | | | | | | |
| Stanislaus | 100% | 100% | | | | | | |
| Orange | 100% | 100% | | | | | | |
| Kings/Madera | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 100% |
| OVERALL | 100% | 95% | 93% | 88% | 100% | 88% | 92% | 91% |

2ND QUARTER 2011

| County | Interpreter Services | Trained Interpreters | Primary Language | Pediatric IHA | Pediatric IHEBA | Ped Dental Assessment | Adult IHA | Adult IHEBA |
|----------------|-------------------------|-------------------------|---------------------|---------------|--------------------|--------------------------|-----------|-------------|
| Los Angeles | 100% | 95% | 63% | 50% | 100% | 83% | 100% | 100% |
| Riverside | 100% | 100% | 100% | NA | NA | NA | 100% | NA |
| San Bernardino | 100% | 100% | 100% | 100% | NA | 100% | 100% | NA |
| San Diego | 100% | 100% | 100% | 100% | 100% | 100% | NA | NA |
| Fresno | 100% | 100% | | | | | | |
| Tulare | 100% | 100% | 100% | 100% | 67% | 100% | 100% | 0% |
| Sacramento | 100% | 100% | | | | | | |
| Kern | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 50% |
| Stanislaus | 100% | 100% | 100% | 100% | 0% | 100% | NA | NA |
| Orange | 100% | 100% | 100% | 100% | 100% | 100% | 100% | NA |
| Kings/Madera | | | | | | | | |
| OVERALL | 100% | 97% | 83% | 91% | 86% | 90% | 100% | 70% |

ACTIVITY SUMMARY

TO: QI CLINICAL AND SERVICE WORKGROUP

FROM: Matthew Robinson, Sr. Research Analyst, QI Research & Analysis

DATE: September 23, 2011

SUBJECT: Reporting Year (RY) 2011 HNCA HEDIS® Medicare SNP Report

Purpose of Activity

The purpose of this report is to present and evaluate the RY 2011 Health Net of California (HNCA) HEDIS® (Healthcare Effectiveness Data and Information Set) Medicare SNP rates based upon Health Net's performance in the measurement year (MY) 2010. The SNP HEDIS population is further broken down into the three major SNP sub-groups: Amber I, Amber II, and Chronic CHF Special Needs Plans. Analysis of Health Net's performance in the SNP product line allows for the identification of barriers and opportunities for improvement.

Quantifiable Measures

Tables 1A-3B (beginning on Page 3) details the HEDIS® measures reported for HNCA Medicare SNP. These measures are categorized into the following domain:

Effectiveness of Care

Threshold(s) /Benchmark(s):

HNCA's RY 2011 Medicare SNP HEDIS® rates are compared to RY 2010 National 75th and 90th percentiles from the National Committee for Quality Assurance (NCQA) 2011 Accreditation Benchmarks and Thresholds – Mid-Year Update for the Medicare product line. These reference standards are therefore only available for those measures that are required for accreditation. Additionally HNCA's RY 2011 Medicare SNP HEDIS® rates are compared to the RY 2011 CCHRI Medicare CA averages. These averages are based on the rates of the California Cooperative Healthcare Reporting Initiative (CCHRI) participating plans in 2011 and are computed by taking the sum of these rates and dividing them by the number of plans. The CMS SNP Mean is also put in place of the CCHRI Medicare Average when available. An 'N/A' is denoted in the report tables where performance thresholds are not available.

Methodology/Sampling/Time Period

HEDIS® measures reported by Health Net were specified using one of the following data collection methodologies – administrative methodology or hybrid methodology. Data collection was conducted per HEDIS® Technical Specifications for RY 2011. RY 2011 rates are statistically tested against Health Net's RY 2010 results, where applicable, using a Chi-Square Test of Proportions, with an alpha of 0.05.6

Administrative Methodology

Identification of denominators and numerators are made using transaction data or other Health Net administrative databases. The denominators consist of the total eligible population as determined by continuous enrollment, age, inclusion criteria, and contraindications. The numerators are identified within Health Net's administrative systems and consist of members within the denominator who were identified as having a qualifying procedure or diagnosis.

Hybrid Methodology

Identification of numerator compliance is conducted through administrative and medical record data extraction. The denominator consists of a systematic sample of members drawn from the measure's eligible population. Health Net reports a rate based on members in the sample who are found through either administrative or medical record data to have received the service required for the numerator.

Non-Trendable Measures

The following measures are considered non-trendable between the specified consecutive years during 2009-2011 due to HEDIS[®] related factors including technical specification changes and introduction of new metrics:

2011 vs. 2010

None

2010 vs. 2009

Colorectal Cancer Screening (COL)

• Lowered Upper Age Limit from 80 to 75 years of age and removed double contrast barium enema (DCBE) from numerator criteria

Table 1A. Summary of HEDIS[®] Measures – HNCA Medicare SNP AMBER I RY 2009-2011, 2011 Reference Standards

| Measure | Program/ Intervention | HN RY 200 9 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percen tile |
|--|---|-----------------------------|-------------------------|-------------------------|---|--|---|---|
| Effectiveness of Care | | | | | | | | |
| Colorectal Cancer Screening ^H ☆ | Member & Physician Newsletter /Adult Screening Tear-Out card | 48.6 8 | 53.10 | 56.07 | 2.97 | 67.70 A | 62▲ | 69▲ |
| Glaucoma Screening in Older Adults [☆] | | 30.9 7 | 46.72 | 52.13 | 5.41 | N/A | 75▲ | 78▲ |
| Care for Older Adult H ☆ | | | | | | | | |
| Advance Care Planning | Provider group teleconference on | 15.2 8 | 21.58 | 30.07 ↑ | 8.49 | 23 ^{SNP} | N/A | N/A |
| Medication Review | SNP specific HEDIS measures including | 56.2 5 | 76.10 | 77.62 | 1.52 | 53 ^{SNP} | N/A | N/A |
| Functional Status Assessment | COA | 15.0 5 | 13.92 | 30.54 ↑ | 16.62 | 28 ^{SNP} | N/A | N/A |
| Pain Screening | | 67.3 6 | 50.35 | 46.15 | -4.20 | 38 ^{SNP} | N/A | N/A |

| Measure | Program/ Intervention | HN RY 200 9 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percen tile |
|--|---|-----------------------------|-------------------------|-------------------------|---|--|---|---|
| Use of Spirometry Testing in Assessment and Diagnosis of COPD | HD Decision Power | N/A ^D | N/A ^D | N/A ^D | N/A | 30.66 | 33 | 38 |
| Pharmacotherapy Management of COPD Exacerbation | A 4TA 4 | | | | | | | |
| Systemic Corticosteroid | MTM | N/A ^D | N/A ^D | N/A ^D | N/A | 63.51 | N/A | N/A |
| Bronchodilator | | N/A ^D | N/A ^D | N/A ^D | N/A | 77.30 | N/A | N/A |
| Controlling High Blood Pressure (<140/90mm Hg) ^H | I AM CHAD | 62.1 2 | 64.34 | 64.60 | 0.26 | 52 ^{SNP} | 66 ▲ | 70▲ |
| Persistence of Beta- Blocker after Heart Attack | HD Decision Power/MTM | N/A ^D | N/A ^D | N/A ^D | N/A | 81.85 | 83 | 88 |
| Osteoporosis Management in Women who had a Fracture [☆] | Osteoporosis Program: Provider & Member Mailings Member Mailer Article Adult Screening tear- out card | N/A ^D | N/A ^D | N/A ^D | N/A | 28.58 | 22 | 29 |

| Measure | Program/ Intervention | HN RY 200 9 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percen tile |
|--|----------------------------------|-----------------------------|-------------------------|-------------------------|---|--|---|---|
| Antidepressant Medication Management | Antidepressant | | | | | | | |
| Acute Phase Treatment Completion | Medication Management | N/A ^D | N/A ^D | N/A ^D | N/A | 67.93 | 68 | 74 |
| Cont. Phase Treatment Completion | Program / MTM | N/A ^D | N/A ^D | N/A ^D | N/A | 51.74 | 56 | 63 |
| Follow-Up After Hospitalization for Mental Illness | MHN Pgm to Encourage FU after | | | | | | | |
| 30-Day Follow up ^A | Hosp. For Mental Illness | N/A ^D | N/A ^D | N/A ^D | N/A | 44.68 | N/A | N/A |
| 7-Day Follow up | | N/A ^D | N/A ^D | N/A ^D | N/A | 32.30 | 56 | 63 |

Table 1B. Summary of HEDIS® Measures – HNCA Medicare SNP AMBER I RY 2009-2011, 2011 Reference Standards

| Measure | Program/Interventio n | HN RY 200 9 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percen tile |
|--|--|-----------------------------|-------------------------|-------------------------|---|--|---|---|
| Annual Monitoring for Patients on Persistent Medications | | | | | | | | |
| ACE Inhibitors or ARBs | | 81.9 1 | 88.95 | 89.27 | 0.32 | 89.66 A | N/A | N/A |
| Digoxin | | N/A ^D | N/A ^D | N/A ^D | N/A | 91.33 | N/A | N/A |
| Diuretics | | 83.5 1 | 89.50 | 90.98 | 1.48 | 89.77 | N/A | N/A |
| Anticonvulsants | | N/A ^D | 58.54 | 76.19 | 17.65 | 62.42 | N/A | N/A |
| Total ^A | | 81.6 9 | 87.83 | 89.37 | 1.54 | 90 SNP | 91 ▲ | 94 ▲ |
| Medication Reconciliation Post-Discharge | Provider group teleconference on SNP specific HEDIS measures including COA | 45.3 1 | 50.49 | 57.38 | 6.89 | 30 ^{SNP} | N/A | N/A |
| Potentially Harmful Drug- Disease Interactions in the Elderly* | Drugs to Be Avoided in the Elderly Program (HNPS) | | | | | | | |

| Measure | Program/Interventio n | HN RY 200 9 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percen tile |
|--|----------------------------------|-----------------------------|-------------------------|-------------------------|---|--|---|---|
| Falls + Tricyclic Antidepressants or Antipsychotics* | | N/A ^D | N/A ^D | 21.15 | N/A | 17.55 A | N/A | N/A |
| Dementia + Tricyclic Antidepressants or Anticholinergic Agents* | | N/A ^D | 39.47 | 41.67 | 2.20 | 25.18 A | N/A | N/A |
| Chronic Renal Failure + Nonaspirin NSAIDs or Cox-2 Selective NSAIDs* | | N/A ^D | NR ^D | NR ^D | N/A | 10.82 | N/A | N/A |
| Total* | | 28.5 7 | 31.43 | 30.94 | -0.49 | 20.74 | N/A | N/A |
| Use of High-Risk Medications in the Elderly* | Drugs to Be Avoided | | | | | | | |
| At Least 1 Prescription* A | in the Elderly Program (HNPS) | 28.5 7 | 28.73 | 27.97 | -0.76 | 22.31 A | 17▲ | 13▲ |
| At least 2 Prescriptions* A | | 6.95 | 5.97 | 6.46 | 0.49 | 4.74▲ | 3▲ | 2▲ |

Statistically significant increase in compliance in RY2011 as compared to RY2010, p<0.05

◆ Statistically significant decrease in compliance in

Lower rate indicates better performance

H Hybrid Measure

- RY2011 as compared to RY2010, p<0.05 Lower performance of HN 2011 rate compared to
- ▲ benchmark (NCQA 90th %ile), QC National 50th Percentile, or the CCHRI Avg
- Denominator <30 and therefore not reportable per NCQA specifications
- A Medicare Accreditation Measure

SNP CMS SNP Mean

- N/ Not Applicable
- ☆ CY2012 CMS Star Measures
- Measure not trendable due to technical specification changes since the previous year; no significance testing was conducted

Table 2A. Summary of HEDIS® Measures – HNCA Medicare SNP AMBER II RY 2009-2011, 2011 Reference Standards

| Measure | Program/ Intervention | HN RY 2009 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percent ile |
|---|---|-------------------------|-------------------------|-------------------------|---|--|---|---|
| Effectiveness of Care | | | | | | | | |
| Colorectal Cancer Screening ^H ☆ | Member & Physician Newsletter Adult Screening Tear- Out card | 41.67 | 46.98 | 54.40 ↑ | 7.42 | 67.70 A | 62▲ | 69▲ |
| Glaucoma Screening in Older Adults [☆] | | 32.08 | 41.42 | 46.86 ↑ | 5.44 | N/A | N/A | 78▲ |
| Care for Older Adult H ☆ | | | | | | | | |
| Advance Care Planning | Provider group | 12.76 | 21.35 | 19.91 | -1.44 | 23 ^{SNP} | N/A | N/A |
| Medication Review | teleconference on | 55.22 | 75.41 | 69.21 | -6.20 | 53 ^{SNP} | N/A | N/A |
| Functional Status Assessment | SNP specific HEDIS measures including COA | 11.60 | 13.46 | 26.39 ↑ | 12.93 | 28 SNP | N/A | N/A |
| Pain Screening | | 64.27 | 47.33 | 37.96 ↓ | -9.37 | 38 SNP | N/A | N/A |
| Use of Spirometry Testing in Assessment and Diagnosis of COPD | HD Decision Power | N/A ^D | 14.29 | 19.85 | 5.56 | 30.66 A | 33▲ | 38▲ |

| Measure | Program/ Intervention | HN RY 2009 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percent ile |
|--|---|-------------------------|-------------------------|-------------------------|---|--|---|---|
| Pharmacotherapy Management of COPD Exacerbation | | | | | | | | |
| Systemic Corticosteroid | MTM | 58.11 | 53.02 | 77.16 | 24.14 | 63.51 | N/A | N/A |
| Bronchodilator | | 86.49 | 77.18 | 90.12 ↑ | 12.94 | 77.30 | N/A | N/A |
| Controlling High Blood Pressure (<140/90 mm Hg) | I AM CHAD | 62.41 | 55.84 | 60.14 | 4.30 | 52 SNP | 66 ▲ | 70▲ |
| Persistence of Beta- Blocker after Heart Attack | HD Decision Power/MTM | N/A ^D | N/A ^D | 81.08 | N/A | 81.85 A | 83▲ | 88▲ |
| Osteoporosis Management in Women who had a Fracture [*] | Osteoporosis Program: Provider & Member Mailings Member Mailer Article Adult Screening tear- out card | N/A ^D | 16.67 | 9.76 | -6.91 | 28.58 | 22▲ | 29▲ |

| Measure | Program/ Intervention | HN RY 2009 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'I 90 th Percent ile |
|--|----------------------------------|-------------------------|-------------------------|-------------------------|---|--|---|---|
| Antidepressant Medication Management | Antidepressant | | | | | | | |
| Acute Phase Treatment Completion | Medication Management | 42.86 | 59.09 | 59.05 | -0.04 | 67.93 ▲ | 68▲ | 74▲ |
| Cont. Phase Treatment Completion | Program/ / MTM | 34.29 | 42.42 | 42.86 | 0.44 | 51.74 ▲ | 56 ▲ | 63▲ |
| Follow-Up After Hospitalization for Mental Illness | MHN Pgm to Encourage FU after | | | | | | | |
| 30-Day Follow up ^A | IIIness _ | 44.78 | 40.00 | 49.73 | 9.73 | 44.68 | N/A | N/A |
| 7-Day Follow up | | 28.36 | 28.75 | 33.16 | 4.41 | 32.30 | 56▲ | 63▲ |

Table 2B. Summary of ${\sf HEDIS}^{\sf @}$ Measures – HNCA Medicare SNP AMBER II RY 2009-2011, 2011 Reference Standards

| Measure | Program/ Intervention | HN RY 2009 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percent ile |
|--|--|-------------------------|-------------------------|-------------------------|---|--|---|---|
| Annual Monitoring for Patients on Persistent Medications | | | | | | | | |
| ACE Inhibitors or ARBs | | 80.31 | 84.53 | 85.18 | 0.65 | 89.66 A | N/A | N/A |
| Digoxin | | 87.72 | 94.83 | 89.74 | -5.09 | 91.33 A | N/A | N/A |
| Diuretics | | 78.91 | 84.46 | 85.64 | 1.18 | 89.77 A | N/A | N/A |
| Anticonvulsants | | 62.26 | 56.38 | 67.15 ↑ | 10.77 | 62.42 | N/A | N/A |
| Total ^A | | 79.23 | 83.61 | 84.72 | 1.11 | 90 SNP | 91 ▲ | 94▲ |
| Medication Reconciliation Post-Discharge | Provider group teleconference on SNP specific HEDIS measures including COA | 41.30 | 51.41 | 53.35 | 1.94 | 30 ^{SNP} | N/A | N/A |

| Measure | Program/ Intervention | HN RY 2009 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percent ile |
|--|---|-------------------------|-------------------------|-------------------------|---|--|---|---|
| Potentially Harmful Drug- Disease Interactions in the Elderly* | | | | | | | | |
| Falls + Tricyclic Antidepressants or Antipsychotics* | | 15.25 | 19.57 | 20.73 | 1.16 | 17.55 ▲ | N/A | N/A |
| Dementia + Tricyclic Antidepressants or Anticholinergic Agents* | Drugs to Be Avoided in the Elderly Program (HNPS) | 36.14 | 36.17 | 34.56 | -1.61 | 25.18 A | N/A | N/A |
| Chronic Renal Failure + Nonaspirin NSAIDs or Cox-2 Selective NSAIDs* | | N/A ^D | 25.00 | 17.65 | -7.35 | 10.82 A | N/A | N/A |
| Total* | | 26.11 | 29.58 | 28.70 | -0.88 | 20.74 | N/A | N/A |
| Use of High-Risk Medications in the Elderly* | Drugs to Be Avoided | | | | | | | |
| At Least 1 Prescription* A | in the Elderly Program (HNPS) | 26.69 | 24.11 | 23.73 | -0.38 | 22.31 | 17▲ | 13▲ |
| At least 2 Prescriptions* A | | 6.95 | 5.16 | 5.33 | 0.17 | 4.74▲ | 3▲ | 2▲ |

- Statistically significant increase in compliance in RY2011 as compared to RY2010, p<0.05
- Statistically significant decrease in compliance in RY2011 as compared to RY2010, p<0.05

 Lower performance of HN 2011 rate compared to
- ▲ benchmark (NCQA 90th %ile), QC National 50th Percentile, or the CCHRI Avg
- D Denominator <30 and therefore not reportable per NCQA specifications
- A Medicare Accreditation Measure

SNP CMS SNP Mean

- * Lower rate indicates better performance
- H Hybrid Measure

N/A Not Applicable

☆ CY2012 CMS Star Measures

Measure not trendable due to technical

specification changes since the previous year; no significance testing was conducted

Table 3A. Summary of HEDIS[®] Measures – HNCA Medicare SNP Chronic RY 2009-2011, 2011 Reference Standards

| Measure | Program/ Intervention | HN RY 2009 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percent ile |
|-----------------------|--------------------------|-------------------------|-------------------------|-------------------------|---|--|---|---|
| Effectiveness of Care | | | | | | | | |

| Measure | Program/ Intervention | HN RY 2009 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percent ile |
|---|--|-------------------------|-------------------------|-------------------------|---|--|---|---|
| Colorectal Cancer Screening ^H ☆ | Member & Physician Newsletter Adult Screening Tear-Out card | N/A | N/A | 67.61 | N/A | 67.70 ▲ | 62 | 69▲ |
| Glaucoma Screening in Older Adults [☆] | | N/A | N/A | 73.39 | N/A | N/A | N/A | 78▲ |
| Care for Older Adult ^{H ☆} | | | | | | | | |
| Advance Care Planning | Provider group | N/A | N/A | 30.08 | N/A | 23 ^{SNP} | N/A | N/A |
| Medication Review | teleconference on | N/A | N/A | 74.80 | N/A | 53 ^{SNP} | N/A | N/A |
| Functional Status Assessment | SNP specific HEDIS measures including COA | N/A | N/A | 34.96 | N/A | 28 ^{SNP} | N/A | N/A |
| Pain Screening | OOA | N/A | N/A | 30.08 | N/A | 38 SNP ▲ | N/A | N/A |
| Use of Spirometry Testing in Assessment and Diagnosis of COPD | HD Decision Power | N/A | N/A | N/A ^D | N/A | 30.66 | 33 | 38 |
| Pharmacotherapy Management of COPD Exacerbation | MTM | | | | | | | |
| Systemic Corticosteroid | | N/A | N/A | N/A ^D | N/A | 63.51 | N/A | N/A |

| Measure | Program/ Intervention | HN RY 2009 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percent ile |
|--|---|-------------------------|-------------------------|-------------------------|---|--|---|---|
| Bronchodilator | | N/A | N/A | N/A ^D | N/A | 77.30 | N/A | N/A |
| Controlling High Blood Pressure (<140/90 mm Hg) | I AM CHAD | N/A | N/A | 78.33 | N/A | 52 SNP | 66 | 70 |
| Persistence of Beta- Blocker after Heart Attack | HD Decision Power/MTM | N/A | N/A | N/A ^D | N/A | 81.85 | 83 | 88 |
| Osteoporosis Management in Women who had a Fracture [☆] | Osteoporosis Program: Provider & Member Mailings Member Mailer Article Adult Screening tear- out card | N/A | N/A | N/A ^D | N/A | 28.58 | 22 | 29 |
| Antidepressant Medication Management | Antidepressant | | | | | | | |
| Acute Phase Treatment Completion | Medication Management | N/A | N/A | N/A ^D | N/A | 67.93 | 68 | 74 |
| Cont. Phase Treatment Completion | Program//MTM | N/A | N/A | N/A ^D | N/A | 51.74 | 56 | 63 |

| Measure | Program/ Intervention | HN RY 2009 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percent ile |
|--|-------------------------------|-------------------------|-------------------------|-------------------------|---|--|---|---|
| Follow-Up After Hospitalization for Mental Illness | MHN Pgm to Encourage FU after | | | | | | | |
| 30-Day Follow up ^A | Hosp. For Mental Illness | N/A | N/A | N/A ^D | N/A | 44.68 | N/A | N/A |
| 7-Day Follow up | | N/A | N/A | N/A ^D | N/A | 32.30 | 56 | 63 |

Table 3B. Summary of HEDIS® Measures – HNCA Medicare SNP Chronic RY 2009-2011, 2011 Reference Standards

| Measure | Program/ Intervention | HN RY 2009 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percent ile |
|--|--|-------------------------|-------------------------|-------------------------|---|--|---|---|
| Annual Monitoring for Patients on Persistent Medications | | | | | | | | |
| ACE Inhibitors or ARBs | | N/A | N/A | 90.79 | N/A | 89.66 | N/A ▲ | N/A ▲ |
| Digoxin | | N/A | N/A | N/A ^D | N/A | 91.33 | N/A | N/A |
| Diuretics | | N/A | N/A | 91.67 | N/A | 89.77 | N/A | N/A |
| Anticonvulsants | | N/A | N/A | N/A ^D | N/A | 62.42 | N/A | N/A |
| Total ^A | | N/A | N/A | 91.10 | N/A | 90 ^{SNP} | 91 | 94 ▲ |
| Medication Reconciliation Post-Discharge | Provider group teleconference on SNP specific HEDIS measures including COA | N/A | N/A | 42.86 | N/A | 30 ^{SNP} | N/A | N/A |
| Potentially Harmful Drug- Disease Interactions in the Elderly* | Drugs to Be Avoided in the Elderly Program (HNPS) | | | | | | | |

| Measure | Program/ Intervention | HN RY 2009 (%) | HN RY 2010 (%) | HN RY 2011 (%) | Change from RY 2010 to RY 2011 (%) | CMS SNP Mean / CCHRI CA Avg | Nat'l 75 th Percent ile | Nat'l 90 th Percent ile |
|--|---|-------------------------|-------------------------|-------------------------|---|--|---|---|
| Falls + Tricyclic Antidepressants or Antipsychotics* | | N/A | N/A | N/A ^D | N/A | 17.55 | N/A | N/A |
| Dementia + Tricyclic Antidepressants or Anticholinergic Agents* | | N/A | N/A | N/A ^D | N/A | 25.18 | N/A | N/A |
| Chronic Renal Failure + Nonaspirin NSAIDs or Cox-2 Selective NSAIDs* | | N/A | N/A | N/A ^D | N/A | 10.82 | N/A | N/A |
| Total* | | N/A | N/A | 33.33 | N/A | 20.74 | N/A | N/A |
| Use of High-Risk Medications in the Elderly* | Drugs to Be Avoided in the Elderly Program (HNPS) | | | | | | | |
| At Least 1 Prescription* A | | N/A | N/A | 34.68 | N/A | 22.31 | 17 | 13 |
| At Least 2 Prescriptions* A | | N/A | N/A | 14.52 | N/A | 4.74▲ | 3 | 2 |

Statistically significant increase in compliance in RY2011 as compared to RY2010, p<0.05

- * Lower rate indicates better performance
- H Hybrid Measure

- RY2011 as compared to RY2010, p<0.05 Lower performance of HN 2011 rate compared to
- ▲ benchmark (NCQA 90th %ile), QC National 50th Percentile, or the CCHRI Avg
- Denominator <30 and therefore not reportable per NCQA specifications
- A Medicare Accreditation Measure

SNP CMS SNP Mean

N/A Not Applicable

- ☆ CY2012 CMS Star Measures
 - Measure not trendable due to technical
- specification changes since the previous year; no significance testing was conducted

Barrier Analysis

By understanding the barriers that affect quality, Health Net can identify methods to overcome those barriers and create interventions to improve quality. Table 4 summarizes performance barriers for metrics with related to 2011 core QI initiatives.

Table 4 – Barriers of Metrics Associated with 2011 Core QI Initiatives

| Measure(s) | Initiative | Barrier |
|---|---|--|
| Measure(s) Colorectal Cancer Screening (COL) | Initiative HEDIS gap colorectal call Mailer to habitual noncompliant <60 Mailer to HEDIS negative Member Newsletter with adult screening tear-out card Provider update on STAR Initiative/Preventive screening Wellness Calendar | Test may be viewed as, "violating", embarrassing and/or painful and may fear a positive cancer dx Literature review indicates: Multiple touches and varied modalities increase screening rates Educational information for providers may be a limited intervention Doctors recommendation may influence screening decision by member |
| | | Structural barriers-distance to mammography center, lack of time and/or transportation Difficult to coordinate collaborative projects with PPG, timelines delayed do to |

| Glaucoma Screening in Older Adults (GSO) | Glaucoma mailer Glaucoma article in Medicare Newsletter Wellness Calendar | coordination between departments within the PPG. • Limitations with data availability and reliability • Members knowledge of benefits • Member confusion regarding eye benefits |
|--|---|---|
| | | Literature review indicates: Multiple touches and varied modalities increase screening rates Educational information for providers may be a limited intervention Doctors recommendation may influence screening decision by member Structural barriers-lack of time and/or transportation |

Table 4 Continued – Barriers of Metrics Associated with 2011 Core QI Initiatives

| Measure(s) | Initiative | Barrier |
|---|--|--|
| Use of Spirometry Testing in the Assessment and Diagnosis of COPD (SPR) | HD Decision Power | Member deficit about proper clinical care for specific conditions Lack of member screening Provider may have deficit of guidelines or may not be aware of HN educational resources Lack of provider time during visit Difficulty in identifying members with a particular disease for timely intervention. |
| Controlling High Blood Pressure (CBP) | Wellness Calendar | Member deficit about proper clinical care for specific conditions Lack of member screening |
| Persistence of Beta- Blocker after Heart Attack (PBH) | HD Decision Power | Member deficit about proper clinical care for specific conditions Lack of member screening Provider may have deficit of guidelines or may not be aware of HN educational resources Lack of provider time during visit Difficulty in identifying members with a particular disease for timely intervention. |
| Osteoporosis | Member & Physician Newsletter Adult | Medical claims and pharmacy |
| Management in Women who had a Fracture | Screening tear-out card • Improve Treatment of Post-menopausal | claims are utilized in order to identify target members in the |

| (OMW) | Osteoporosis (OMW) in Members with Post Osteoporotic Fractures • Intervention program designed to improve screening and treatment of women age >65 for osteoporosis following a fracture. • Pilot Quality Improvement Programs: Osteoporosis Management in Women Who Have Had a Fracture • Transmission of educational materials to members/providers in addition to provider level alerts. | intervention so timely submission essential. Primary care physician (PCP) may not be aware of the fracture, may not have seen the patient recently or the patient may have switched PCP. |
|-------|--|---|
|-------|--|---|

Table 4 Continued – Barriers of Metrics Associated with 2011 Core QI Initiatives

| Measure(s) | Initiative | Barrier |
|--|---|---|
| Antidepressant Medication Management (AMM) | Increase Compliance with Antidepressant Medication Management (AMM) Program | Costs involved in the treatment of depression Possible cultural/ethnic perceptions and stigma around behavioral health care, and the lack of resources for providers and members to overcome this obstacle Limitations with data availability and reliability Lag in reporting. Difficulty in implementation and monitoring of interventions. |
| Potentially Harmful Drug-Disease Interactions in the Elderly (DDE) | Decrease Use of Drugs to be Avoided in the Elderly (DAE) | Member reluctance to change medication MD unaware of medication regimen and/or best choice |
| Use of High-Risk Medications in the Elderly (DAE) | Decrease Use of Drugs to be Avoided in the Elderly (DAE) | Member reluctance to change medication MD unaware of medication regimen and/or best choice |



Western Region Medicare QI Team
Medicare Health Outcomes Survey (HOS)
Combined 2008 Cohort 11 & 2009 Cohort 12 Baseline Report
AZ H0351, CA H0562, OR H5520

| AZ H0351, CA H0562, OR H5520 | |
|------------------------------|--|
| Committee Action Required: | |

Purpose of Report:

The Medicare Health Outcomes Survey (HOS) provides beneficiary self-reported outcomes measurement for Medicare managed care. The HOS evaluates physical and mental health status and can be used to evaluate clinical outcomes for Health Net, Inc.'s (HN) Medicare populations, including SNP members, as well as assist HN in developing Western Region quality improvement (QI) strategies.

Introduction:

The Centers for Medicare and Medicaid Services (CMS) Medicare Health Outcome Survey, or HOS, is an important part of the CMS' quality improvement activities. Current law authorizes Quality Improvement Organizations (QIOs) to ensure that the medical care that is paid for under the Medicare program meets professionally recognized standards of health care. Collected since 1998, the Medicare HOS is the only patient-reported outcomes measurement in Medicare managed care. The HOS evaluates physical and mental health status using the Veterans RAND 12-Item Health Survey (VR-12), and asks participants a series of questions about their usual activities and perceptions of their physical and mental health status. The goal of the HOS is to gather valid and reliable health status data in Medicare managed care for use in quality improvement activities, public reporting, Medicare Advantage Organization (MAO) accountability, and improving health outcomes.

The HOS baseline reports are part of a larger effort by CMS to improve the health care industry's capacity to sustain and improve health status and functioning in its Medicare population. The baseline reports are designed to guide each MAO in identifying the overall health of their Medicare population in order to develop programmatic interventions aimed at maintaining or improving health status. For each Cohort, a randomly

selected group of members are surveyed for baseline and two-year follow-up information. The follow-up survey measures a plan's ability to maintain or improve the physical and mental health functioning of its beneficiaries over a two-year period.

MAOs are encouraged to use the HOS data to target quality improvement strategies as follows:

- ➤ Identify opportunities for quality improvement activities
 - HEDIS measures for which the MAO had substantially lower rates when compared to state or national benchmarks
 - Specific chronic conditions or negative health symptoms that are associated with lower physical and mental health status
 - Conditions or negative symptoms for which the MAO has a disproportionately high prevalence compared to state and national average
- Prioritize and select areas for quality improvement activities
- Set goals and performance objectives for quality improvement activities
- Perform a root cause analysis and develop a quality improvement action plan
- Measure and monitor performance over time
- Provide performance feedback to physicians

Quantifiable Measures Associated with CMS Star Ratings:

The HOS reports provide participating member demographic data broken down into the categories of age, gender, race, marital status, education, annual income and Medicaid status. In addition, the HOS reports contain information on baseline measures of physical and mental health, chronic medical conditions, functional status (i.e. Activities of Daily Living), clinical measures, NCQA HEDIS® measures and other health status indicators.

For the purposes of this report, only the HOS measures that are associated with the CMS Star Rating System will be presented in detail. A brief presentation on Chronic Medical Conditions will also be provided. The following HOS measures are associated with the CMS Star Rating System.

Health Status Measures:

- Physical Component Summary (PCS) Score and the Mental Component Summary (MCS) Score
- Improving/maintaining physical health
- Improving/maintaining mental health

NCQA HEDIS® Measures- There is a total of four NCQA HEDIS® Measures found in the HOS:

- Management of Urinary Incontinence in Older Adults (MUI)
 - o Discussing Urinary Incontinence
 - Receiving Urinary Incontinence Treatment
- Physical Activity in Older Adults (PAO)
 - Discussing Physical Activity
 - Advising Physical Activity
- Fall Risk Management (FRM)
 - o Discussing Fall Risk
 - Managing Fall Risk
- Osteoporosis Testing in Older Women

A complete list of the questions associated with the above measures can be found in Attachment B.

Benchmark(s)/Threshold(s)/Reference Value(s):

For the majority of HOS measures there are no established benchmarks or thresholds. Health Net rates are compared to the results of year-over-year subsequent baseline reports and the two-year follow-up reports to the HOS Total (national rates) for all measures, with the exception of the NCQA HEDIS® measures.

For the NCQA HEDIS[®] measures, the Health Net rates are compared to the National 50th and 90th Percentiles as published by the National Committee for Quality Assurance (NCQA) in the *NCQA Accreditation Benchmarks and Thresholds* document that is published on an annual basis. The document provides organizations with national benchmarks and national and regional thresholds for HEDIS[®] measures.

Methodology/Sampling/Time Period:

On an annual basis, CMS administers the HOS during the 1st-2nd Quarter, with the electronic distribution of the reports to the participating MAOs during the 3rd- 4th Quarter via the CMS' Health Plan Management System (HPMS). CMS utilizes a mixed method of data collection, involving telephone and mailed surveys, along with prenotification and reminder postcards. The surveys included telephone follow-up in those instances where the beneficiary failed to respond to a second mail survey. Survey vendors used a standardized version of a Computer Assisted Telephone Interviewing (CATI) script to collect the interview data for the survey. Telephone surveys were also performed in English or Spanish for the

members who returned incomplete forms in order to obtain missing responses.

For each *Cohort*, a random sample of Medicare beneficiaries is obtained from all participating MAOs. All MAOs with CMS contracts in effect on or before January 1st of the year preceding the year of the Baseline report are required to administer the survey; i.e. MAOs contracted on or before 1/1/2007 were required to administer the 2008 Baseline HOS. MAOs with 500 or fewer members are not required to report HOS. MAOs with 500-1200 members are required to report HOS on all eligible members. MAOs with > 1200 members and < 3000 members are required to submit the HOS on a randomized sample of 1200 beneficiaries.

Members who responded to the 2008 Cohort 11 Baseline survey were excluded from the 2009 Cohort 12 Baseline sample. Ineligible members are defined as deceased, not enrolled in the MAO, members with incorrect address and phone numbers and members with a language barrier. The analytic sample includes beneficiaries who completed the HOS in English, Spanish or Chinese. The diagram in Figure #1 illustrates the process of how the analytic sample is obtained for the baseline surveys included in this report.

Eligible sample

Less

Eligible < 65 yr

Less

Non-respondents

Analytic sample

Figure 1: Distribution of the Sample

The HOS Total sample includes beneficiaries, who completed the survey, both aged and disabled from MAOs participating in the *2008 Cohort 11 Baseline* and *2009 Cohort 12 Baseline*, 286 and 361 respectively. A completed survey is defined as one that could be used to calculate the summary scores in the PCS or MCS.

Table 1: Analytic Samples & Response Rates

| Cohort | AZ Sample (Response Rate) | CA Sample (Response Rate) | OR Sample (Response Rate) | HOS Total (Response Rate) |
|-------------|---------------------------------|---------------------------------|---------------------------------|---------------------------------|
| 2008 Cohort | 632 (61.3%) | 673 (63.7%) | 787 (70.7%) | 202,382 |
| 11 | | | | (59.0%) |
| 2009 Cohort | 658 (65.2%) | 695 (63.4%) | 821 (73.5%) | 250,733 |
| 12 | | | | (62.6%) |

Quantitative Analysis:

The 2008 Cohort 11 Baseline and 2009 Cohort 12 Baseline survey results for the Western Region's Medicare product lines are summarized in each of the following sections.

Demographics

The largest percentages for Health Net members who responded to the 2008 Cohort 11 Baseline and 2009 Cohort 12 Baseline survey were:

- Age: Arizona ages 70-79; California ages 75-79; and Oregon ages 70-74
- Gender: Females
- o Race: White
- Marital Status: Married
- Education: Arizona & Oregon- High School Graduate; California-Some College
- Annual Household Income: Arizona \$10,000-\$19,000; Oregon \$20,000-\$49,00; and California \$50,000 or more

Table 2 presents detailed demographics by Cohort and CMS contract.

Table 2: Demographics of Health Net's HOS Respondents

| Domographio | Ariz (H0: | ona 351) | | ornia 562) | Ore (H5 | gon 520) |
|------------------------|--------------|-------------|--------|---------------|------------|-------------|
| Demographic | Cohort | Cohort | Cohort | Cohort | Cohort | Cohort |
| | 11 | 12 | 11 | 12 | 11 | 12 |
| Age | | | | | | |
| 65-69 | 22.0% | 17.6% | 18.9% | 14.4% | 27.2% | 22.7% |
| 70-74 | 23.9% | 28.4% | 23.6% | 25.0% | 29.5% | 30.9% |
| 75-79 | 24.7% | 27.5% | 25.4% | 27.5% | 20.7% | 21.1% |
| 80-84 | 17.7% | 15.7% | 17.7% | 16.5% | 14.5% | 14.5% |
| 85+ | 11.7% | 10.8% | 14.4% | 16.5% | 8.1% | 10.8% |
| Gender | | | | | | |
| Male | 43.0% | 40.7% | 40.9% | 40.4% | 44.5% | 40.3% |
| Female | 57.0% | 59.3% | 59.1% | 59.6% | 55.5% | 59.7% |
| Race | | | | | | |
| White | 91.8% | 91.5% | 81.0% | 78.8% | 98.1% | 97.4% |
| Black | 2.1% | 2.3% | 3.1% | 5.3% | 1.0% | 0.4% |
| Other/Unknown | 6.2% | 6.2% | 15.9% | 15.8% | 0.9% | 2.2% |
| Marital Status | | | | | | |
| Married | 58.7% | 57.8% | 52.5% | 53.8% | 64.2% | 61.3% |
| Widowed | 27.4% | 27.9% | 30.7% | 29.1% | 20.8% | 22.6% |
| Divorced/Separated | 11.8% | 12.1% | 13.2% | 12.8% | 13.5% | 14.6% |
| Never Married | 2.1% | 2.2% | 3.7% | 4.4% | 1.5% | 1.5% |
| Education | | | | | | |
| Did not graduate HS | 21.9% | 21.0% | 18.2% | 20.9% | 13.8% | 14.0% |
| High school graduate | 33.8% | 33.8% | 27.1% | 25.1% | 35.2% | 39.8% |
| Some college | 26.5% | 25.1% | 28.8% | 28.9% | 29.9% | 28.8% |
| 4 yr degree or | 17.8% | 20.2% | 25.9% | 25.1% | 21.2% | 17.4% |
| beyond | | | | | | |
| Annual Household | | | | | | |
| Income | | | | | | |
| < \$10,000 | 9.7% | 8.8% | 7.1% | 6.7% | 6.4% | 8.4% |
| \$10,000-\$19,000 | 29.1% | 29.1% | 18.0% | 17.2% | 21.6% | 22.7% |
| \$20,000-\$29,000 | 18.9% | 20.0% | 15.0% | 17.6% | 23.8% | 23.5% |
| \$30,000-\$49,000 | 19.4% | 20.1% | 23.5% | 23.0% | 24.0% | 23.4% |
| \$50,000 or more | 12.8% | 11.8% | 26.8% | 25.5% | 17.1% | 16.0% |
| Don't know | 10.1% | 10.2% | 9.7% | 10.0% | 7.1% | 6.0% |

Health Status Measures:

Physical and Mental Component Summary Scores (PCS & MCS)

The health status measures for the HOS consist of PCS and MCS scores. The HOS evaluates physical and mental health status using the Veterans RAND 12-Item Health Survey (VR-12), and asks participants a series of questions about their usual activities and the perceptions of their physical and mental health status. Some of the concepts included in the measure are physical functioning, general health, vitality, social functioning and mental health. The PCS and MCS scores are case-mix adjusted to allow for equitable comparisons across the MAOs, allowing for differences in the demographics, socioeconomic characteristics and chronic medical conditions. The following figures depict the mean case-mix adjusted PCS and MCS scores for the various Health Net CMS contracts and the associated HOS Total by *Cohort*.



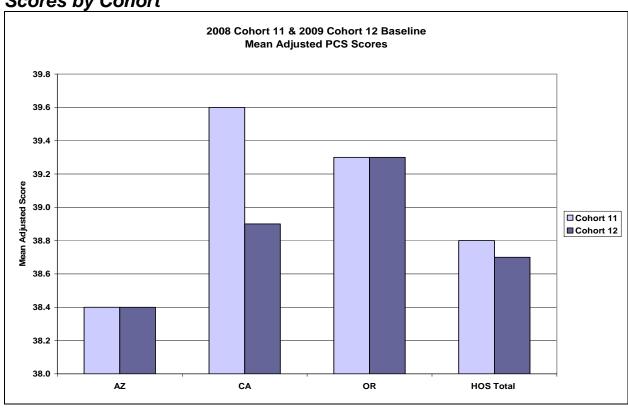
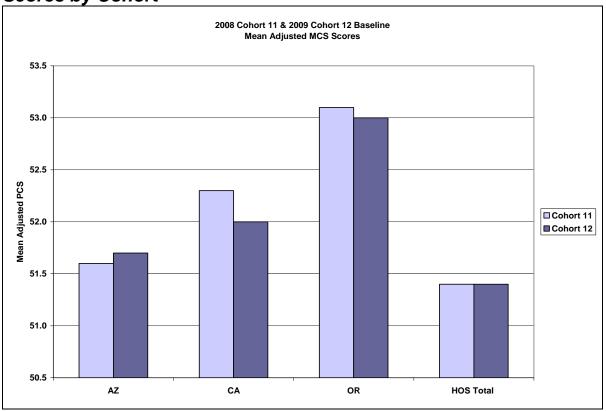


Figure 3: Baseline Mean Adjusted Mental Component Summary Scores by Cohort

2008 Cohort 11 & 2009 Cohort 12 Baseline



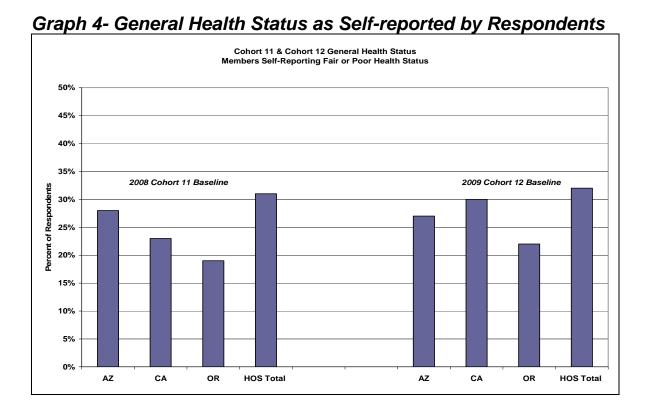
General Health and Comparative Health

The General Health and Comparative Health measures include the elements of the participant's self-reported health status, and self-reported physical and mental health status compared to one year ago. Deterioration in general health or comparative health status can be used as a tool to forecast members' risk for hospitalization and predict a potential increase in utilization of services.

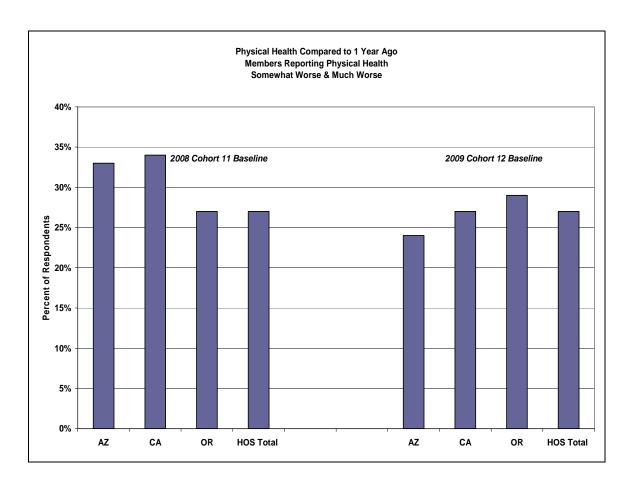
Compared to the HOS Total respondents, Health Net members reported lower rates of "fair" to "poor" general health status in each of the states, as well as an overall lower rate for the total Health Net respondents. For the 2008 Cohort 11 Baseline survey, Health Net members from AZ and OR reported higher rates of "fair" and "poor" health status, then the rate reported for the HOS Total population. For the 2009 Cohort 12 Baseline survey the Health Net reported rates for all three states were lower than the HOS Total. The CA respondents reported the highest rate within the Western Region, representing an increase to 30 percent.

In addition, 2008 Cohort 11 Baseline respondents for Health Net AZ reported a much higher rate of Mental Health status changes of somewhat worse and much worse than seen in Health Net CA and OR respondents (by 8% & 9% respectively) and was five percent higher than the rate reported for the HOS Total population. For the 2009 Cohort 12 Baseline survey, Health Net AZ and CA respondents reported similar rates to the HOS Total population, while the Health Net respondents from OR reported lower rates overall (by 2%).

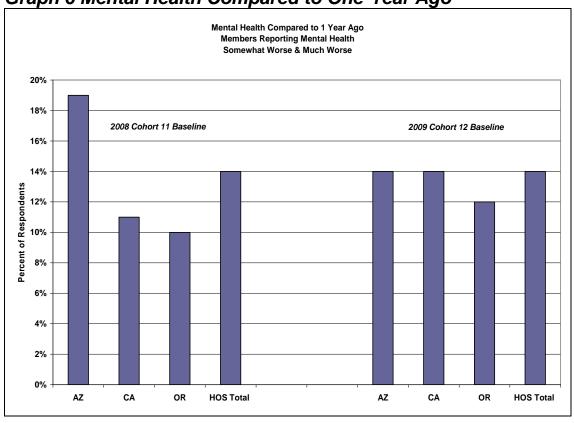
The following figures display the Health Net respondents' self-reported General Health and comparative Physical and Mental Health Status.



Graph 5 Physical Health Compared to One-Year Ago







NCQA HEDIS® Measures:

The tables in this section depict the mean HEDIS[®] rates for each *Cohort* and are calculated from the combination of *Cohort Baseline* and *Cohort Follow-Up* data that was collected during the combined surveys. The rates represent the data obtained from non-duplicated respondents to the two surveys that were administered in 2008 and 2009, and have been rounded to the closest two-digit percentage.

Physical Activity in the Older Adult (PAO)

The PAO measure is comprised of two questions that gather data on a member's discussion of physical activity with a doctor or other health care provider. The two rates that are calculated for this measure are:

- Discussing physical activity
- Advising physical activity

Table 3 discusses the Health Net respondents' rates by state and *Cohort*, compared to the HOS Total populations. Arizona respondents reported lower rates of Discussing Physical Activity and Advising Physical Activity than both CA and OR, as well as the HOS Total population, for both *Cohort 11* and *Cohort 12*. Overall the rates for Advising Physical Activity were similar across the states and HOS Total for Cohort 12.

Table 3 PAO rates by State and Cohort

| Tubic 5 1 A | Table 51 A0 Tales by Glate and Gonore | | | | | | | |
|----------------------------------|---------------------------------------|--------|--------|--------|--------|--------|--------|--------|
| Component | Α | Z | С | Α | 0 | R | HOS | Total |
| | Cohort | Cohort | Cohort | Cohort | Cohort | Cohort | Cohort | Cohort |
| | 11 | 12 | 11 | 12 | 11 | 12 | 11 | 12 |
| Discussing Physical Activity | 52% | 51% | 58% | 57% | 55% | 59% | 52% | 52% |
| Advising Physical Activity | 45% | 43% | 50% | 48% | 47% | 48% | 47% | 47% |

Management of Urinary Incontinence in Older Adults (MUI)

The MUI measure is comprised of two questions that gather data on a member's discussion of urinary incontinence with a doctor or other health care provider. The two rates that are calculated for this measure are:

- Discussing urinary incontinence (UI)
- Receiving urinary incontinence (UI) treatment

Table 4 discusses the Health Net respondents' rates by state and *Cohort*, compared to the HOS Total populations. Arizona respondents reported

lower rates of Discussing UI than both CA and OR. Arizona and California demonstrated lower rates for Receiving UI Treatment than seen in Oregon; however were similar to the HOS Total rates.

Table 4 MUI rates by State and Cohort

| Component | AZ | | С | Α | OR | | HOS Total | |
|------------------------------|--------|--------|--------|--------|--------|--------|------------------|--------|
| | Cohort | Cohort |
| | 11 | 12 | 11 | 12 | 11 | 12 | 11 | 12 |
| Discussing UI | 57% | 54% | 62% | 59% | 60% | 58% | 58% | 58% |
| Receiving UI Treatment | 35% | 36% | 37% | 36% | 46% | 42% | 36% | 36% |

Fall Risk Management (FRM)

The FRM measure is comprised of two questions that gather data on a member's discussion of risk for falls with a doctor or other health care provider. The two rates that are calculated for this measure are:

- Discussing fall risk
- Managing fall risk

Overall Health Net respondents reported lower rates in both components of the FRM measure than was seen in the HOS Total population for both *Cohort 11* and *Cohort 12*. Table 5 discusses the Health Net respondents' rates by state and *Cohort*, compared to the HOS Total populations.

Table 5 FRM rates by State and Cohort

| Component | Α | Z | CA | | OR | | HOS Total | |
|------------------|--------|--------|--------|--------|--------|--------|-----------|--------|
| | Cohort | Cohort |
| | 11 | 12 | 11 | 12 | 11 | 12 | 11 | 12 |
| Discussing FRM | 29% | 28% | 26% | 28% | 26% | 29% | 31% | 31% |
| Receiving FRM | 54% | 53% | 57% | 58% | 47% | 44% | 57% | 57% |

Osteoporosis Testing in Older Women (OTO)

The OTO measure assesses the percentage of women aged 65 and older who report ever having received a bone density test to check for osteoporosis.

Overall Health Net respondents reported higher rates in the OTO measure than were seen in the HOS Total population for both *Cohort 11* and *Cohort 12*. The Health Net respondents from CA reported the lowest rates for the Western Region states in *Cohort 11;* while AZ reported the lowest rate in *Cohort 12*. Table 6 discusses the Health Net respondents' rates by state and *Cohort*, compared to the HOS Total populations.

Table 6 OTO rates by State and Cohort

| Component | AZ | | С | Α | 0 | R | HOS | Total |
|------------------------------|--------|--------|--------|--------|--------|--------|--------|--------|
| | Cohort |
| | 11 | 12 | 11 | 12 | 11 | 12 | 11 | 12 |
| Osteoporosis Testing Rate | 80% | 76% | 74% | 78% | 77% | 79% | 68% | 69% |

Chronic Medical Conditions:

For 2008 Cohort 11 and 2009 Cohort 12, the Health Net members reported hypertension, followed by arthritis of the hip/knee and arthritis of the hand/wrist as the top three prevalent chronic conditions. Table 7 illustrates the self-reported rates by state and *Cohort*:

Table 7 Chronic Medical Conditions

| Condition | AZ | | С | Α | OR | |
|-------------------------|---------------|-----|--------|--------|--------|--------|
| | Cohort Cohort | | Cohort | Cohort | Cohort | Cohort |
| | 11 | 12 | 11 | 12 | 11 | 12 |
| Hypertension | 62% | 62% | 66% | 65% | 57% | 59% |
| Arthritis hip/knee | 44% | 43% | 37% | 41% | 35% | 34% |
| Arthritis hand/wrist | 39% | 42% | 37% | 39% | 40% | 38% |

Table 8 illustrates the self-reported rates by cancer types, broken down by *Cohort* and state, with an overall Western Region rate by *Cohorts*:

Table 8 Cancer Diagnoses

| | | , | | | | |
|-------------|--------|--------|--------|--------|--------|--------|
| Condition | AZ | | С | Α | OR | |
| | Cohort | Cohort | Cohort | Cohort | Cohort | Cohort |
| | 11 | 12 | 11 | 12 | 11 | 12 |
| Any Cancer, | 17% | 15% | 19% | 17% | 17% | 17% |

| except skin | | | | | | |
|--------------|----|----|----|----|----|----|
| Colon/Rectal | 3% | 3% | 1% | 2% | 1% | 2% |
| Breast | 4% | 3% | 6% | 3% | 5% | 5% |

Conclusions:

Health Net members from AZ demonstrate lower mean case mix adjusted rates for both the Physical Component Summary (PCS) Scores and Mental Component Summary (MCS) Scores than was evident in the California or Oregon survey participants. When compared to the HOS Total population, Health Net members reported higher rates of "fair" and "poor" physical and mental health compared to one year ago for both *Cohorts*.

Further analysis was performed on the combined *Cohorts* with a Western Region (WR) approach and perspective on the data. The analysis demonstrated there are similar health outcomes throughout all Health Net Medicare populations that can affect the members' PCS, MCS and General Health status. Those similarities follow:

- Arthritis of the hip/knee is the second most prevalent chronic condition
- Participants report an average of 25 out of 30 days with limited activity
- Over 66 percent of the WR participants report that pain interfered with normal work (housework or outside the house)
- Over 30 percent of the WR participants report moderate to severe arthritic pain
- Between 35-41 percent of the WR participants reported 4 or more chronic medical conditions
- Overall 75 percent of the WR members reported having one or more impaired ADLs, with 26 percent of those reporting 4 or more impaired ADLs.
- Between 41-42 percent of the WR participants reported having urinary incontinence (UI)
- Between 55-58 percent of the WR participants with UI reported that the incontinence is a problem for them
- Overall 23 percent of the WR respondents reported having fallen within the past year
- WR rates for both FRM components are lower than rates seen in the HOS Total population
- WR rates for OTO are higher than those seen in the HOS Total population

- Overall 17 percent of the WR participants report having been diagnosed with some type of cancer, other than skin; CA has the highest rate at 18 percent, followed by OR, then AZ respectivelyhigher than the HOS Total @ 15 percent
- Overall 2 percent of the WR participants report having been diagnosed with colon/rectal cancer; AZ has the highest rate at 3 percent, followed by CA, then OR respectively
- Overall 4 percent of the WR participants report having been diagnosed with breast cancer; OR has the highest rate at 5 percent, followed by CA, then AZ respectively

The Health Net CMS Star Ratings for relevant HOS measures can be found in the table located in *Appendix A*.

Areas for Opportunities/Interventions Analysis:

Table 9 presents the identified areas with potential opportunities for improvement, recommendations/interventions and follow-up.

Table 9 Potential Quality Improvement Activities

| Opportunity | Recommendation(s)/Interventions | Follow-Up |
|------------------|-------------------------------------|---------------|
| Management of | 2011 Western Region QIP | Annually & as |
| Urinary | IVR Women's' Campaign | needed |
| Incontinence in | Add to Health Education Calendar | |
| Older Adults | Provider Update Five-Star Quality | |
| | Rating | |
| | WR Medicare Member Newsletter | |
| Fall Risk | Health Education Calendar | Annually & as |
| Management | IVR Women's' Campaign | needed |
| | Provider Education | |
| | Provider Update Five-Star Quality | |
| | Rating | |
| | WR Medicare Member Newsletter | |
| Osteoporosis | IVR Campaign | Annually & as |
| Testing in Older | Add to Health Education Calendar | needed |
| Women | Provider Update Five-Star Quality | |
| | Rating | |
| | WR Medicare Member Newsletter | |
| Management of | Health Education Calendar | Annually & as |
| Arthritic Pain | Rheumatoid Arthritis Barrier Survey | needed |
| | Collaborate on initiative with HNPS | |
| | Provider Update Five-Star Quality | |
| | Rating | |

| Cancer screening & | Health Education Calendar | Annually & as |
|--------------------|-----------------------------------|---------------|
| member education | IVR Women's' Campaign | needed |
| | IVR Colorectal Screening Campaign | |
| | Provider Update Five-Star Quality | |
| | Rating | |
| | WR Medicare Member Newsletter | |

Appendix A: Health Net Star Ratings by HOS Measure

| HOS Measure | California | Oregon | Arizona |
|-------------------------------------|------------|--------|---------|
| Staying Healthy | | | |
| Monitoring Physical Activity | 2 | 2 | 1 |
| Improving/Maintaining Physical | 4 | 4 | 5 |
| Health | | | |
| Improving/Maintaining Mental Health | 2 | 2 | 2 |
| Osteoporosis Testing | 4 | 5 | 4 |
| Managing Chronic Conditions | | | |
| Bladder Control | 2 | 3 | 2 |
| Risk for Fall | 3 | 1 | 2 |

Appendix B: NCQA HEDIS® Measures Frequency of Member Responses Tables

PAO frequency of responses by State and Cohort

| Component | Α | Z | C | Α | 0 | R | HOS Total | | | |
|----------------------------------|--------|--------|--------|--------|--------|--------|------------------|--------|--|--|
| | Cohort | Cohort | | |
| | 11 | 12 | 11 | 12 | 11 | 12 | 11 | 12 | | |
| Discussing Physical Activity | 48% | 50% | 56% | 55% | 53% | 55% | 52% | 52% | | |
| Advising Physical Activity | 43% | 46% | 49% | 46% | 46% | 46% | 47% | 47% | | |

MUI frequency of responses by State and Cohort

| Component | Α | Z | С | Α | 0 | R | HOS Total | | |
|------------------------------|--------|--------|--------|--------|--------|--------|-----------|--------|--|
| | Cohort | Cohort | |
| | 11 | 12 | 11 | 12 | 11 | 12 | 11 | 12 | |
| Discussing UI | 40% | 36% | 44% | 41% | 46% | 44% | 58% | 58% | |
| Receiving UI Treatment | 24% | 23% | 26% | 24% | 33% | 33% | 36% | 36% | |

FRM frequency of responses by State and Cohort

| Component | Α | Z | С | Α | 0 | R | HOS Total | | |
|----------------|--------|--------|--------|--------|---------------|-----|-----------|--------|--|
| | Cohort | Cohort | Cohort | Cohort | Cohort Cohort | | Cohort | Cohort | |
| | 11 | 12 | 11 | 12 | 11 | 12 | 11 | 12 | |
| Discussing FRM | 21% | 21% | 17% | 18% | 15% | 17% | 31% | 31% | |
| Receiving FRM | 29% | 27% | 27% | 32% | 21% | 23% | 57% | 57% | |

OTO frequency of responses by State and Cohort

| Component | Α | Z | С | Α | 0 | R | HOS Total | | | |
|------------------------------|--------|--------|--------|--------|--------|---------------|-----------|--------|--|--|
| | Cohort | Cohort | Cohort | Cohort | Cohort | Cohort Cohort | | Cohort | | |
| | 11 | 12 | 11 | 12 | 11 | 12 | 11 | 12 | | |
| Osteoporosis Testing Rate | 51% | 55% | 52% | 53% | 48% | 52% | 68% | 69% | | |

Appendix C: Questions Associated with Quality Initiatives and the CMS Star Rating System

| Question | Question |
|----------|---|
| # | aussion |
| 1 | In general, how would you say your health is? |
| 5 | During the past 4 weeks, how much did pain interfere with your normal work (including both work outside the home and housework)? |
| 8 | Compared to one year ago, how would you rate your physical health in general now? |
| 9 | Compared to one year ago, how would you rate your emotional problems (such as feeling anxious, depressed or irritable) in general now? |
| 13 | During the past 30 days, for about how many days did poor physical or mental health keep you from doing your usual activities, such as self-care, work or recreation? |
| 17 | During the past 4 weeks, how would you describe any arthritis pain you usually had? |
| 42 | Many people experience problems with urinary incontinence, the leakage of urine. In the past 6 months, have you accidentally leaked urine? |
| 43 | How much of a problem, if any, was the urine leakage for you? |
| 44 | Have you talked with your current doctor or other health provider about your urine leakage problem? |
| 45 | There are many ways to treat urinary incontinence including bladder training, exercises, medication and surgery. Have you received these or any other treatments for your current urine leakage problems? |
| 46 | In the past 12 months, did you talk with your doctor or other health provider about your level of exercise or physical activity? |
| 47 | In the past 12 months, did a doctor or other health provider advise you to start, increase or maintain your level of exercise or physical activity? |
| 48 | A fall is when your body goes to the ground without being pushed. In the past 12 months, did you talk to your doctor or other health provider about falling or problems with balance or walking? |

| 49 | Did you fall in the past 12 months? |
|----|--|
| 51 | Has your doctor or other health provider done anything to help prevent falls or treat problems with balance or walking? |
| 52 | Have you ever had a bone density test to check for osteoporosis, sometimes thought of as "brittle bones?" This test may have been done to your back, hip, wrist, heel or finger. |

Appendix D: NCQA HEDIS® Measures Specifications

Management of Urinary Incontinence in Older Adults (MUI) - Two components are used to assess the different facets of managing urinary incontinence in the older adult population.

- <u>Discussing Urinary Incontinence</u>: the percentage of Medicare members, 65 years of age and older, who reported having a urine leakage problem in the past six (6) months, and who discussed the problem with their current doctor or other health care provider.
- <u>Receiving Urinary Incontinence Treatment</u>: the percentage of Medicare members, 65 years of age and older, who reported having a urine leakage problem in the past six months, and who received treatment for their current urine leakage problem.

Physical Activity in Older Adults (PAO) - Two components are used to assess the different facets of promoting physical activity in the older adult.

- <u>Discussing Physical Activity</u>: the percentage of Medicare members 65 years of age and older who had a doctor's visit in the past 12 months, and who talked with a doctor or other health provider about their level of exercise or physical activity.
- Advising Physical Activity: the percentage of Medicare members 65
 years of age and older who had a doctor's visit in the past 12 months,
 and who received advice to start, increase, or maintain their level of
 exercise or physical activity.

Fall Risk Management (FRM) - The following components of the measure are used to assess the different facets of fall risk management:

- <u>Discussing Fall Risk</u>: the percentage of Medicare members 75 years
 of age and older, or 65-74 years of age with balance or walking
 problems or a fall within the past 12 months, who were seen by a
 doctor or other health provider in the past 12 months, and who
 discussed falls or problems with balance or walking with their
 provider.
- Managing Fall Risk: the percentage of Medicare members 65 years
 of age and older who had a fall or had problems with balance or
 walking in the past 12 months, and who received fall risk intervention
 from their provider.

Osteoporosis Testing in Older Women (OTO) - This measure assesses the number of women 65 years of age and older that report ever having received a bone density test to check for osteoporosis.









| | | | 2 | 2010 Hea | Ith Net | | | 201 | 11 Health | Net | |
|---|---------------------------------|-----|-----|-------------|---------|---------------------------------|-----|-----|-------------|-------|----------------------------|
| MQR #8b, Attachment # 12 Medicare CAHPS 4.0 Measure | CAHPS 4.0 Question Number | Den | Num | Den- Num | Rate | CAHPS 4.0 Question Number | Den | Num | Den- Num | Rate | P-VALUE 2010 VS 2011 |
| Overall Rating of Health Plan | Q32 | 269 | 232 | 37 | 86.2% | 37 | 342 | 301 | 41 | 88.0% | 0.5979 |
| Overall Rating of Care Received | Q32 Q9 | 217 | 181 | 36 | 83.4% | 12 | 339 | 279 | 60 | 82.3% | 0.8239 |
| Overall Rating of Personal Doctors | Q20 | 216 | 199 | 17 | 92.1% | 21 | 278 | 257 | 21 | 92.4% | 0.0239 |
| Overall Rating of Specialist | Q24 | 102 | 88 | 14 | 86.3% | 28 | 192 | 162 | 30 | 84.4% | 0.7927 |
| Health Plan Customer Service Composite | Composite | 102 | 00 | 17 | 92.3 | Composite | 132 | 102 | 50 | 92.0% | 0.7 527 |
| Give Information Needed | Q28 | 84 | 69 | 15 | 82.1% | 33 | 121 | 99 | 22 | 81.8% | 1 |
| ■ Courtesy and Respect ↓ | Q29 | 86 | 84 | 2 | 97.7% | 34 | 122 | 106 | 16 | 86.9% | 0.0133 |
| ■ Forms Easy to Fill Out* | Q23 Q31 | 74 | 55 | 19 | 74.3% | 36 | 95 | 77 | 18 | 81.1% | 0.3887 |
| Getting Needed Care Composite | Composite | | | . 0 | 81.3 | Composite | | | .0 | 91.8% | 0.0001 |
| Getting Appointments with Specialists | Q22 | 115 | 94 | 21 | 81.7% | 26 | 206 | 176 | 30 | 85.4% | 0.4779 |
| Getting Needed Care, Tests, or Treatment | Q26 | 152 | 123 | 29 | 80.9% | 31 | 198 | 161 | 37 | 81.3% | 1 |
| Getting Care Quickly Composite | Composite | | | | 86.1 | Composite | | | | 84.0% | |
| Getting Needed Care Right Away | Q4 | 95 | 84 | 11 | 88.4% | 4 | 147 | 128 | 19 | 87.1% | 0.9119 |
| Getting Regular/Routine Appointments | Q6 | 214 | 172 | 42 | 80.4% | 6 | 261 | 221 | 40 | 84.7% | 0.2662 |
| Within 15 Min of Appt | Q8 | 219 | 114 | 105 | 52.1% | 8 | 271 | 156 | 115 | 57.6% | 0.2594 |
| Doctors Who Communicate Well Composite | Composite | | | | 89.9 | Composite | | | | 96.2% | |
| Provided Clear Explanations | Q16 | 219 | 191 | 28 | 87.2% | 17 | 281 | 256 | 25 | 91.1% | 0.2095 |
| Listened Carefully | Q17 | 219 | 201 | 18 | 91.8% | 18 | 278 | 256 | 22 | 92.1% | 1 |
| Showed Respect for What Patients Have to | | | | | | | | | | | |
| Say | Q18 | 218 | 201 | 17 | 92.2% | 19 | 281 | 257 | 24 | 91.5% | 0.8923 |
| Spent Enough Time With Patients | Q19 | 219 | 194 | 25 | 88.6% | 20 | 281 | 249 | 32 | 88.6% | 1 |
| HEDIS [®] Metrics | | | | | | | | | | | |
| Influenza Vaccination | Q67 | 264 | 135 | 129 | 51.1% | 70 | 335 | 184 | 151 | 54.9% | 0.4007 |
| Pneumonia Shot T | Q69 | 240 | 103 | 137 | 42.9% | 71 | 303 | 188 | 115 | 62.0% | <0.0001 |
| Additional Medicare Specific Metrics | | | | | | | | | | | |
| Getting Medical Equipment | Q11 | 72 | 45 | 27 | 62.5% | 14 | 116 | 85 | 31 | 73.3% | 0.1637 |
| Plan Prescription Drug Coverage | | | | | | | | | | _ | |
| Overall Rating of Prescription Drug Coverage | Q52 | 261 | 232 | 29 | 88.9% | 60 | 333 | 291 | 42 | 87.4% | 0.6654 |









| | | | 2 | 2010 Hea | Ith Net | | | 201 | 11 Health | Net | |
|---|---------------------------------|----------|----------|-------------|----------------|---------------------------------|----------|----------|-------------|----------------|----------------------------|
| MQR #8b, Attachment # 12 Medicare CAHPS 4.0 Measure | CAHPS 4.0 Question Number | Den | Num | Den- Num | Rate | CAHPS 4.0 Question Number | Den | Num | Den- Num | Rate | P-VALUE 2010 VS 2011 |
| Willingness to Recommend Plan for Drug | | | | | | | | | | | |
| Coverage ¹ | Q53 | 269 | 247 | 22 | 91.8% | 61 | 345 | 310 | 35 | 89.9% | 0.4883 |
| Getting Needed Prescription Drugs ¹ | - | | | | 94.5 | Composite | | | | 97.1% | |
| Ease of Getting Prescribed Medicines | Q47 | 256 | 236 | 20 | 92.2% | 55 | 330 | 292 | 38 | 88.5% | 0.1773 |
| Ease of Filling Prescriptions (combined item) | - | | | | | 57/59 | 278 | 258 | 20 | 92.8% | |
| ■ Ease of Filling Prescriptions at a Pharmacy↓ | Q49 | 215 | 208 | 7 | 96.7% | 57 | 269 | 246 | 23 | 91.4% | 0.0271 |
| Ease of Filling Prescriptions by Mail | Q51 | 21 | 18 | 3 | 85.7% | 59 | 42 | 39 | 3 | 92.9% | 0.6489 |
| Getting Information About Prescription Drug Coverage and Cost ¹ | - | | | | 86.9 | Composite | | | | 88.1% | |
| Customer Service Give Information↓ | Q37 | 56 | 48 | 8 | 85.7% | 45 | 45 | 28 | 17 | 62.2% | 0.0129 |
| Customer Service Courtesy and RespectWhich Drugs Are Covered | Q38 Q40 | 54 50 | 49 44 | 5 6 | 90.7% 88.0% | 46 48 | 43 45 | 34 32 | 9 13 | 79.1% 71.1% | 0.1822 0.0722 |
| Out-of-Pocket Costs | Q42 | 42 | 35 | 7 | 83.3% | 50 | 59 | 41 | 18 | 69.5% | 0.1755 |

1 Change in phrasing of question when comparing 2010 to 2011 questionnaire.

Denominator less than 100

- Information is either Not Applicable or Not Available.
- ↓↑ Statistically significant difference between HN 2011 score and the HN 2010 score, p<0.05.
 *Different than DSS report









MQR #8b, Attachment 13

HOS Metrics Contract H0562 (MA and SNP combined)

2011 Cohort #13 Results

| Measure | 2011 |
|---------------------------------------|-----------|
| | Cohort 13 |
| MUI Urinary Incontinence Discuss Rate | 57.7 |
| MUI Urinary Incontinence Treat Rate | 34.9 |
| PAO Physical Activity Discuss Rate | 60.4 |
| PAO Physical Activity Advise Rate | 51.2 |
| FRM Fall Risk Discuss Rate | 29.3 |
| FRM Fall Risk Manage Rate | 57.7 |
| OTO Osteoporosis Testing Rate Women | 69.9 |









MQR #9 - Attachment 14

9. NCQA Accreditation

Health Net's Medicaid product line (Medi-Cal) holds a COMMENDABLE accreditation status from the National Committee for Quality Assurance (NCQA) and Health Net's Medicare product line (including SNP) holds an EXCELLENT accreditation status with the NCQA and is CMS Medicare Advantage Deemed Status.









MQR #11 - Attachment 15

11. Americans with Disabilities Act and Alternative Format

Health Net Community Solutions, Inc. ("Health Net") fully complies with all state and federal disability accessibility and civil rights laws in all areas of service provision, access to facilities and access to information. Health Net ensures that all translation and interpreter service vendors, including alternate format vendors, are fully compliant with ADA requirements through the implementation of quality standards in its contracting, monitoring and quality improvement efforts.

Health Net provides alternative format materials upon request for all member-informing materials, which include materials for members with visual impairment in an alternate form such as large print, Braille, Analog and Digital audio (e.g. AAC, MP3, WMA, WAV), or CDDA (computer disk digital audio), DAISY and Accessible PDF. Health Net records member alternate format preference in the member's record. Health Net will routinely promote the use of sign language services and availability of materials in alternate format to contracted providers through Provider Updates, provider newsletters, and on-site education by the Medi-Cal Facility Site Review (FSR) nurses. Contracted providers will be encouraged to use a qualified sign language interpreter for all medical encounters, when obtaining informed consent and discouraged from using minors, family or friends as interpreters. Health Net will arrange and pay for sign language interpreters at the member or physician request for all dual eligible members. Health Net has a network of sign language vendors for all counties throughout California to assure









all dual eligible will have access to interpreter support. Health Net includes sign language services and alternate format services in our Language Assistance Program. All language services are monitored for quality and utilization.

To provide an additional level of support to ensure ADA compliance, Health Net contracts with the Harris Family Center for Disability and the Health Professions (HFCDHP). Since 2006, HFCDHP has provided Health Net expertise and guidance in the development of policies, procedures, provider trainings, identifying new communication technology and staff trainings for accessibility to health care for Seniors and Persons with Disabilities (SPD) members. Health Net, in collaboration with DHCS and HFCDHP, developed a Provider Accessibility Review Survey (PARS) to survey PCP sites to identify sites with Basic and Limited Access. The PARS assessment provides accessibility information for a member's independent access to parking, exterior building, interior building, restrooms, exam room and medical equipment audit. Health Net's Medi-Cal FSR Compliance Department conducts periodic (every 3 years) Physical Accessibility Review Surveys (PARS) to assess the physical accessibility of primary care provider sites. The PARS includes identified high volume specialists, and ancillary providers that serve the SPD population as well as hospitals. Results of the PARS assessment are made available to the Customer Contact Center to assist SPD members in selecting a PCP that can best serve their health care needs. The PCP accessibility status is also provided in the Health Net member web portal and in the Provider Directory.









MQR #12 – Attachment 16

Stakeholder Involvement **12.**

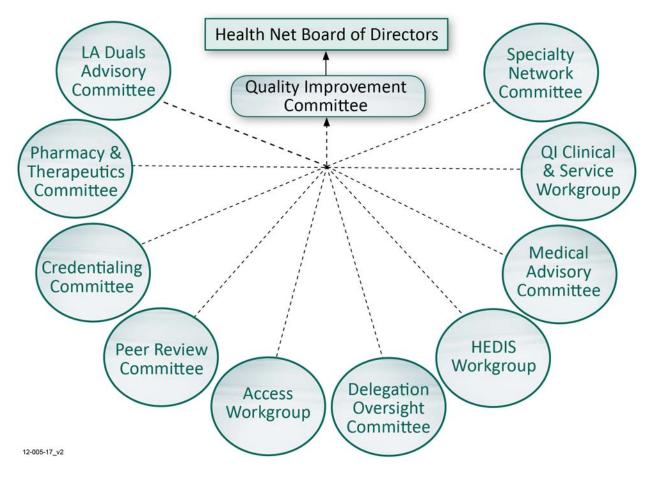
Option 2 – Advisory Board

The Health Net LA Duals Advisory Committee will be comprised of a member from each of the county's eight service planning areas (SPAs). Health Net will consult with Home- and Community-Based Services (HCBS) programs, the Area Agencies on Aging (AAA), and the LA County Mental Health Department to help identify Health Net members to serve on the advisory committee for two-year terms. Health Net will seek advice from the eight member representatives to identify community-based stakeholder representatives to fill the other eight seats. Health Net will retain the consulting services of the Harris Family Center for Disability and Health Policy to help develop and staff this committee. As the diagram below illustrates, the Committee will report to Health Net's Board of Directors via the Quality Improvement Committee.









Partner programs will be invited to participate in meetings. This includes representatives from AAA; Regional Centers; Community-Based Adult Services (CBAS) providers; LA County Department of Mental Health; and long-term support services (LTSS) programs, including Multipurpose Senior Services Program (MSSP).

Option 3 - Letters of Support

Health Net has attached five letters of support from the community, with sources including advocates for seniors and persons with disabilities, organizations representing LTSS, such as community-based organizations, and/or individual health care providers. **Attachment 16** contains letters from: California Association of Area Agencies on Aging (C4A), California Association of Adult Day Services









(CAADS), St. Barnabas Senior Services, California Foundation for Independent Living Centers (CFILC), and AltaMed Health Services Corporation.

Option 4 - Stakeholder Input into Development of Application

Health Net certifies that our response to Section 2 of the RFS has been largely developed based on feedback from LA stakeholders, advocates, and state-level organizations (C4A, CAADS, and CFILC). Feedback from the Personal Assistance Services Council (PASC) of LA County was incorporated in all of the IHSS-related responses.

Option 5 - Program of Stakeholder Involvement

The LA County Project Narrative, Section 5.4.1 provides a description of Health Net's program of stakeholder involvement.

AltaMed

January 27, 2012

Health Net, Inc Hugo Florez, Region Network Director Provider Network Management - GLA Region 1055 E. Colorado Blvd., Suite 300 Pasadena, CA 91325



Re: Letter of Commitment for Dual Eligible Demonstration Pilot

Dear Mr. Florez:

On behalf of AltaMed Health Services Corporation, Inc., (AltaMed) I am expressing our interest and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles County, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). We are interested in participating in this pilot with Health Net. While the details of our participation and relationship remain to be negotiated, we are committed to continuous collaboration with Health Net toward a successful conclusion. Additionally, we understand that any agreement entered into for the purposes of participating in the Dual Eligible provider network, shall comply with all of the requirements and regulations established by DHCS and CMS.

AltaMed is committed to improving the health status of the diverse communities that we collectively serve. We look forward to working closely with Health Net on the Dual Eligible Demonstration Pilot as a community healthcare partner to achieve greater coordination of benefits, access to care and improved health outcomes.

Please feel free to contact Martha Santana-Chin, Vice President, Provider Network Operations and Development at (323.622.2496) regarding this letter of commitment and support.

De Roll

Cástulo de la Rocha, J.D.

President & CEO

Sincere



CALIFORNIA ASSOCIATION OF AREA AGENCIES ON AGING

February 22, 2012

Toby Douglas Director California Department of Health Care Services 1501 Capitol Avenue, MS 0000 Sacramento, CA 95899-7413

Re: Letter of Commitment for Dual Eligible Demonstration Pilot – Los Angeles County

Dear Director Douglas:

On behalf of the California Association of Area Agencies on Aging (C4A), I am expressing our support and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles County, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). We are committed to continuous collaboration with Health Net and LA Care toward a successful conclusion.

Health Net has been an articulate and dedicated member of our Advisory Board for the past five years. As the only health plan member, we have come to appreciate and value Health Net's contribution to our Board and its work.

C4A is committed to improving the health status of the diverse communities that we collectively serve. We look forward to working closely with Health Net and LA Care on the Dual Eligible Demonstration Pilot as a partner. Through greater coordination, networking, and resource exchange together we can improve health outcomes through timely access to comprehensive, patient-centered care. We hope our partnership with LA Care and Health Net in this project will help make the Demonstration Pilot a reality for LA County residents.

Please feel free to contact me regarding this letter of commitment and support.

Sincerely,

Derrell Kelch

Executive Director

Cc: Janice Milligan, RN

Director, Public Programs

Health Net Community Solutions



1107 9th Street Suite 701 Sacramento, California 95814-3610 Tel: Fax: E-mail: Web:

916.552.7400 866.725.3123 <u>caads@caads.org</u> www.caads.org

February 20, 2012

Toby Douglas
Director
California Department of Health Care Services
1501 Capitol Avenue, MS 0000
Sacramento, CA 95899-7413

Re: Letter of Commitment for Dual Eligible Demonstration Pilot

Dear Director Douglas:

On behalf of the California Association of Adult Day Services (CAADS), I am writing to express our strong support and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles and San Diego counties, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). Our Board of Directors is committed to participating in this Demonstration with Health Net. We are committed to continuous collaboration with Health Net to achieve the goals of the project and successful outcomes.

Health Net has been an articulate and dedicated supporter of our mission. Over the past year of intensive work with the public programs team at Health Net, we have come to appreciate and value Health Net's contribution to our shared vision and goals.

CAADS is committed to improving the health status of the diverse communities that we collectively serve through our members' provision of CBAS. We look forward to working closely with Health Net on the Dual Eligible Demonstration Pilot, with CAADS and our provider members serving as partners in this project. Through greater coordination, networking, and resource exchange, together we can improve health outcomes through timely access to comprehensive, patient-centered care. We believe that our partnership with Health Net in this project will help make the Demonstration Pilot a successful reality for Los Angeles and San Diego county Medi-Cal residents with complex chronic conditions who choose to remain living in their community.

Please feel free to contact me at (916) 552-7402 regarding this letter of commitment and support.

Sincerely,

Lydia Missaelides, MHA

Sydia Dri

Executive Director

Cc: Janice Milligan, RN

Director, Public Programs

Health Net Community Solutions

CAADS Board of Directors



Chair Sheri Burns

Community Resources for Independent Living Hayward

Vice Chair **Dolores Kollmer**

Dayle McIntosh Center Garden Grove

Member at Large Yomi Wrong

Center for Independent Living, Inc. Berkeley

Treasurer Robert Hand

Resources for Independence Central Valley Fresno

Secretary Sarah Triano

Silicon Valley Independent Living Center San Jose

Development Chair Eli Gelardin

Marin Center for Independent Living Marin

State Independent Living Council Representative

Louis Frick

Access to Independence San Diego

Immediate Past Chair Elsa Quezada

Central Coast Center for Independent Living

FREED Nevada City

PIRS Auburn

DSLC Santa Rosa

ILR Concord

ILRC San Francisco

CID San Mateo

II RC Santa Barbara **ILCKC** Bakersfield

WCIL Los Angeles

CALIF Central Los Angeles

CRS East Los Angeles DRC Long Beach

SCRS Downey

SCIL Claremont

RSI San Bernardino

CAC Riverside

Teresa Favuzzi

Executive Director

1234 H Street, Suite 100 Sacramento, CA 95814

(916) 325-1690 (916) 325-1695 TDD (916) 325-1699 FAX

www.cfilc.org

February 23, 2012

Toby Douglas Director, California Department of Health Care Services 1501 Capitol Avenue, MS 0000 Sacramento, CA 95899-7413

Re: Support & Commitment to Dual Eligible Demonstration Pilot

Dear Director Douglas:

On behalf of the California Foundation for Independent Living Centers (CFILC), I am expressing our support and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles and San Diego counties, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). We are interested in participating in this Demonstration with Health Net. We are committed to continuous collaboration with Health Net toward a successful conclusion.

Health Net has been an articulate and dedicated supporter of our mission for over five years. We have come to appreciate and value Health Net's contribution to our work.

CFILC is committed to improving the health status of the diverse communities that we collectively serve. We look forward to working closely with Health Net on the Dual Eligible Demonstration Pilot as a partner. Through greater coordination, networking, and resource exchange together we can improve health outcomes through timely access to comprehensive, consumer directed care. We hope our partnership with Health Net in this project will help make the Demonstration Pilot a reality for LA and San Diego county residents.

Please feel free to contact me at (916)326-1690 regarding this letter of commitment and support.

Best regards,

Teresa Favuzzi. MSW **Executive Director**

Janice Milligan, RN Director, Public Programs Cc: **Health Net Community Solutions**



February 20, 2012

Toby Douglas Director California Department of Health Care Services 1501 Capitol Avenue, MS 0000 Sacramento, CA 95899-7413

Re: Letter of Commitment for Dual Eligible Demonstration Pilot

Dear Director Douglas:

On behalf of ST. Barnabas Senior Services (SBSS), I am writing to express our strong support and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles and San Diego counties, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). St. Barnabas Senior Services (SBSS) is committed to participating in this Demonstration with Health Net. We are committed to continuous collaboration with Health Net to achieve the goals of the project and successful outcomes.

Health Net has been an articulate and dedicated supporter of our programs and overall mission. Over the past year of intensive work with the public programs team at Health Net, we have come to appreciate and value Health Net's contribution to our shared vision and goals.

SBSS is committed to improving the health status of the diverse communities that we collectively serve through our provision of CBAS. We look forward to working closely with Health Net on the Dual Eligible Demonstration Pilot, and serving as a potential partner in this project. Through greater coordination, networking, and resource exchange, together we can improve health outcomes through timely access to comprehensive, patient-centered care. We believe that our partnership with Health Net in this project will help make the Demonstration Pilot a successful reality for Los Angeles and San Diego county Medi-Cal residents with complex chronic conditions who choose to remain living in their community.

Please feel free to contact me at (213) 388-4444 regarding this letter of commitment and support.

Sincerely,

Rigo Saborio, MSG President /CEO

Cc: Janice Milligan, RN

Director, Public Programs

Health Net Community Solutions 675 S. Carondelet Street Los Angeles • California 90057-3309 telephone (213) 388-4444 fax (213) 739-2972



County of Los Angeles CHIEF EXECUTIVE OFFICE

Kenneth Hahn Hall of Administration 500 West Temple Street, Room 713, Los Angeles, California 90012 (213) 974-1101 http://ceo.lacounty.gov

February 21, 2012

Board of Supervisors GLORIA MOLINA First District

MARK RIDLEY-THOMAS Second District

ZEV YAROSLAVSKY Third District

DON KNABE Fourth District

MICHAEL D. ANTONOVICH Fifth District

Mr. Toby Douglas, Director Department of Health Care Services 1501 Capitol Avenue, MS 0000 P.O. Box 997413 Sacramento, CA 95899-7413

Dear Mr. Douglas:

I am writing to express our intended involvement in the Health Net of California proposal for California's Dual Eligible Demonstration Request for Solutions, submitted in conjunction with the L.A. Care Health Plan. As Chief Executive Officer of the County of Los Angeles, I have executive authority over most County departments and operations, including the Departments of Health Services, Public Social Services, which administers the In-Home Supportive Services (IHSS) program, Mental Health, and Community and Senior Services, which includes the Area Agency on Aging.

County of Los Angeles is home to approximately 374,000 Duals, with an annual combined Medi-Cal and Medicare expense of over \$10 billion in 2009, which is almost \$30,000 per beneficiary. County of Los Angeles presents a tremendous opportunity to test comprehensive and accountable care at a scale sufficient to yield timely and generalized findings on quality and costs prior to statewide implementation.

We believe Health Net and L.A. Care have developed a comprehensive and fully integrated proposal that not only meets the demonstration goals, but will fundamentally change the delivery of care in the County of Los Angeles, improve quality of life for some of the County's most vulnerable citizens, and reduce health care costs.

Integral to Health Net and L.A. Care's proposal is leveraging existing organized systems in the County of Los Angeles. While the details of our participation continue to be developed, the County of Los Angeles is committed to collaborating with Health Net and L.A. Care toward a successful Implementation.

Thank you for your time and consideration.

Sincerely.

WILLIAM T FUJIOKA Chief Executive Officer

WTF:SAS:hd

022112_HMHS_LACountyCEOLetterofSupportHealthNet-LACare_L

"To Enrich Lives Through Effective And Caring Service"

Please Conserve Paper – This Document and Copies are <u>Two-Sided</u> Intra-County Correspondence Sent Electronically Only

Contract # H 213344

PUBLIC HEALTH AGREEMENT WITH HEALTH NET

| | THIS AGREEMENT is made and entered | d into this 12th day |
|------|------------------------------------|---|
| of _ | March , 2002, | |
| | by and between | HEALTH NET |
| | and | COUNTY OF LOS ANGELES (hereafter "Contractor"). |

WHEREAS, the State of California ("State") has through statute, regulation, and policies, adopted a plan ("State Plan") for certain categories of Medi-Cal recipients to be enrolled in managed care plans for the provision of specified Medi-Cal benefits; and

WHEREAS, pursuant to the State Plan, the State will contract with two health care service plans in Los Angeles County, one of which is a health care service plan locally created and designated by the County's Board of Supervisors, and the other of which is an existing health care service plan that is selected by the State; and

WHEREAS, in accordance with the requirements of the agreement ("State/Health Net Agreement") entered into between Health Net and State Department of Health Services ("SDHS"), Health Net will arrange for the provision of health care services for Health Net Members ("Members") as part of a coordinated, culturally and linguistically sensitive health care delivery program in compliance with applicable Federal and State laws; and

Services for Seniors and Persons with Disabilities

1) In-Home Supportive Services (IHSS)

The In-Home Supportive Services Program is one of several social service programs funded by the State and administered through the County that enables the elderly and/or disabled to avoid premature out-of-home placement (i.e.: nursing homes or broad and care facilities) by allowing them to continue residing safely within the community in their own home. The types of services which can be authorized through IHSS are housecleaning, meal preparation, laundry, grocery shopping, personal care services (such as bowel and bladder care, bathing, grooming and paramedical services), accompaniment to medical appointments, and protective supervision for the mentally impaired.

To be eligible, you must be over 65 years of age, or disabled, or blind. Disabled children are also eligible for IHSS. IHSS recipients are automatically eligible for Medi-Cal for their medical/health care. For most people who qualify for IHSS, the in-home care benefits are paid for under the Personal Care Services Program (PCSP) which is a Medi-Cal benefit.

Communication and Coordination between the PLAN, its participating providers, the COUNTY IHSS program, and the Member's IHSS worker is imperative to ensure the Members' social needs are identified and addressed in a timely manner that prevents adverse influences to their physical and behavioral health. Additionally, the parties shall provide the specified services as described below in providing services associated with IHSS in the manner described in the following table.



Services for Seniors and Persons with Disabilities

In-Home Supportive Services (IHSS)

| | CATEGORY | IHHS | HEALTH NET |
|-----|---|--|---|
| 3.2 | LIAISON | a. Designate a liaison as the point of contact for the Plan, to address referral and coordination related activities. | Designate Plan liaison as the point of contact with IHHS to address referral and coordination related activities. |
| 3.3 | PROVIDER TRAINING | a. IHHS Outreach and Education staff will provide training to Plan staff and providers on IHSS Programs as requested by Plan and within the capacity of IHSS staff to accommodate training requests. b. IHSS will make training about working | a. Request training from IHSS Outreach and Education staff for Plan staff and contracted providers on IHSS programs as needed. b. Provide link to online training to Plan staff and contracted providers. |
| | | with SPDs, coordinating care, and locating needed services and supports accessible online to Plan and providers. A link to online training modules will be provided by IHSS. | |
| 3.4 | COMMUNICATION AND CARE COORDINATION | a. IHSS will provide the following to the Plan: Access and instructions to make referrals to In Home Supportive Services (IHSS) and Case Management Programs via the Web Referral System. The IHSS staff roster monthly. An encrypted e-mail account to communicate issues, questions etc., related to IHSS Programs and Services. IHSS will review the e-mails and will provide a response by the most appropriate individual within 48 liours. IHSS staff will facilitate case discussions with the Plan as needed | a. Provide service authorization if needed, as well as medical record review information with IHSS to facilitate communications and care coordination regarding their mutual member/client population. b. Provide nursing assessments with IHSS staff as requested and needed to ensure the most appropriate service delivery by IHSS Programs for mutual member/client population. c. Assist IHSS care coordination staff as needed to obtain required service documentation to ensure timely and quality delivery of IHSS Programs for mutual member/client population. |
| 3.5 | DATA EXCHANGE | a. Review, analyze and share relevant IHSS data with Plan about their members who are receiving IHSS services or are being referred to IHSS Programs, as allowed and with needed authorizations obtained. | a. Provide data to IHSS about shared members or members who are being referred to IHSS Programs, as allowed and with needed authorizations obtained. |
| 3.6 | MEMBER OUTREACH AND EDUCATION | a. Distribute informational materials about Medi-Cal enrollment and benefits to SPDs and their providers. | a. Inform SPD members about availability of IHSS Program. Provide IHSS Outreach and Education staff with informational materials about Medi-Calenrollment and benefits to distribute to SPDs and their providers. |

| | CATEGORY | IHHS HEALTH NET |
|-----|------------------------|--|
| 3.7 | QUALITY IMPROVEMENT | a. Participate in the monthly Liaison meetings with PLAN to address and resolve quality issues and ensure ongoing communication between IHSS and the Plan. a. Participate in the monthly Liaison meetings with PLAN to address and resolve quality issues and ensure ongoing communication between IHSS and the Plan. |
| | | b. Work with PLAN (QI) staff as needed. b. Work with PLAN (QI) staff as needed. |
| | | c. Coordinate with PLAN liaison to review and update this Agreement as appropriate. c. Coordinate with PLAN liaison to review and update this Agreement as appropriate. |
| 3.8 | PROBLEM RESOLUTION | a. Establish and maintain policies and procedures governing problem resolution. Establish and maintain policies and procedures governing problem resolution. |
| | | b. IHHS Liaison will coordinate problem resolution with PLAN Liaison to address operational, administrative and policy issues. b. IHHS Liaison will coordinate problem resolution with PLAN Liaison to address operational, administrative and policy issues. |
| | | c. IHSS Liaison will involve appropriate IHSS Management Team staff to address and resolve quality, administrative or operational issues presented by Plan in monthly Liaison meeting. E. IHSS Liaison will involve appropriate IHSS Management Team staff to address and resolve quality, administrative or operational issues presented by Plan in monthly Liaison meeting. |
| | | d. If problem cannot be resolved at the local level, notify the DDS IHSS Program. Manager. d. If problem cannot be resolved at the local level, notify DHCS Medi-Cal Managed Care Division Contract Manager. |

J 3 ...

HEALTH NET OF CALIFORNIA, INC.

LOS ANGELES COUNTY DEPARTMENT OF MENTAL HEALTH, LOCAL MENTAL HEALTH PLAN

MEMORANDUM OF UNDERSTANDING

MEMORANDUM OF UNDERSTANDING

Between

HEALTH NET OF CALIFORNIA, INC.

and

LOS ANGELES COUNTY DEPARTMENT OF MENTAL HEALTH, LOCAL MENTAL HEALTH PLAN

This Memorandum of Understanding (MOU) is made and entered into on the 17th day of July 2001, by and between Health Net of California, Inc. (Health Net) and the Los Angeles County Department of Mental Health, operating as the Local Mental Health Plan (LMHP) in Los Angeles County.

I. RECITALS

Whereas, the State of California ("State") has, through statute, regulation and policies, adopted a plan ("State Plan") for certain categories of Medi-Cal recipients to be enrolled in managed care plans for coverage of specified Medi-Cal benefits, and

Whereas, pursuant to the State Plan, the State has contracted with two health plans in Los Angeles County, L.A Care ("Local Initiative") and Health Net, whereby Health Net is required to cover certain physical health services to Medi-Cal members, and

Whereas mental health services are not covered by Health Net, except for mental health services within the scope of practice of the member's contracting Health Net primary care physician, and

Whereas, the LMHP is required to provide mental health services to Medi-Cal beneficiaries in Los Angeles County under the authority of the California Code of Regulations (CCR), Title 9, Division 1, Chapter 11, Sections 1810.100 through 1850.505, when Medi-Cal beneficiaries meet the medical necessity criteria of the Department of Mental Health for mental health services, and

Whereas, the parties understand the importance of health care services in the amelioration and/or management of mental health problems, and

Whereas, this (MOU) sets out: (1) the general relationship between the parties, (2) the responsibilities of the parties, (3) the responsibilities of the sharing of medical records, and (4) dispute resolution process between the parties, and

ac: 6/28/01

MEMORANDUM OF UNDERSTANDING BETWEEN HEALTH NET AND THE LOS ANGELES COUNTY DEPARTMENT OF MENTAL HEALTH AS THE LOCAL MENTAL HEALTH PLAN $P.\ 2$ of 5

Whereas, the provisions of this MOU are not legally binding, and Now, therefore, the parties understand as follows:

I. JOINT RESPONSIBILITIES

Services Provided

- 1. The LMHP will provide mental health services to those beneficiaries who quality for services as defined by the LMHP pursuant to State regulations and the Department of Mental Health (DMH) contract with the State Department of Mental Health.
- 2. Health Net will arrange physical health care services for its Los Angeles County Medi-Cal Members according to Health Net's contract with the State Department of Health Services, which includes the evaluation, assessment and treatment of mental health problems within the scope and practices of the member's contracting Health Net primary care physician.

Financial Considerations

3. No monetary obligation of any kind for either party is established by this MOU.

Program Interface

- 4. Beneficiary confidentiality is to be maintained in accordance with applicable laws.
- 5. Each party to this MOU will provide the phone number and location of 24-hour emergency services for Medi-Cal beneficiaries.
- 6. Each party to this MOU will provide to the other the names and phone numbers of appropriate program and administrative liaison staff. Liaison staff will be sufficiently acquainted with the respective plan's programs.
- 7. Each party will provide to the other sufficient information to refer Health Net members or mental health facilities in the member's area of residence.

Data Collection and Information

8. Aggregate data may be shared by mutual consent for purposes of review, evaluation and accountability, so long as no identifying information is used without appropriate release of information.

ac: 6/28/01

9. Information on prescription medication, treatment and diagnoses may be shared between Health Net's contracting providers and the LMHP for purposes of integrated management of a member's medical and mental health conditions, in accordance with all applicable laws, regulations, and policies governing information sharing and protection of patient confidentiality.

Consultation

- 10. Each party will develop a process for consultation between Health Net's contracting providers and the LMHP as necessary and as permitted by applicable law, in the interests of continuity of care for members.
- 11. Health Net contracting providers may request consultation in clinical situations necessary to determine whether the beneficiary qualifies for the LMHP.
- 12. The LMHP may request consultation concerning the medical condition of a member in clinical situations necessary to determine the member's need for physical health care.

II. RESPONSIBILITIES OF LMHP

Responsibilities of the LMHP are specified in the attached matrix and below:

1. Mental health evaluation and assessment, diagnosis and triage.

2. Access to mental health services with the availability of a 24-hour, 7 days per week toll-free telephone number.

3. Determination of qualification of members for services from the LMHP.

4. Medication management for mental health conditions.

5. Mental health inpatient services, mental health case management services, mental health therapy, cooccurring mental health substance abuse and diagnostic services, EPSDT supplemental services for mental health conditions.

6. Emergency mental health services and consultation 24 hours daily.

7. Clinical consultation services.

8. Referral to appropriate mental health services.

9. Pharmaceutical records for mental health conditions.

10. Data collection/sharing.

11. Provider credentialing and enrollment of LMHP providers.

12. Quality assurance/improvement plan and programs for LMHP.

13. Dispute resolution process for LMHP.

III. RESPONSIBILITIES OF HEALTH NET

Notwithstanding any provisions in this MOU to the contrary, the parties understand and agree that Health Net does not provide any health care services and that it has subcontracted all such responsibilities to be performed by contracting providers. All references in this MOU to Health Net are deemed to refer to such subcontracting providers, when applicable. In addition, references to Health Net are also deemed to apply to its subcontracting health plans, when applicable.

Contracting Health Net primary care physicians may provide evaluation and assessment of mental health problems within their scope of practice. The scope of practice may include examination of the member, discussion of symptoms and problems, appropriate medication that alleviates specific conditions, and referrals for mental health services when such referrals are reasonably believed to be effective in alleviating the mental health symptoms and problems of the member. Health Net will arrange all physical health care services for Medi-Cal members in accordance with the requirements of its Medi-Cal contract with the State.

IV. JOINT RESPONSIBILITIES

Services Provided

- 1. Each party will maintain a quality management system.
- 2. A plan will be jointly developed for resolving disputes between the parties concerning this MOU.
- 3. Each party will maintain a grievance process for members. The grievance procedure established by Health Net and the grievance procedure established by the LMHP will not be the same grievance procedure.
- 4. Educational programs may be established by mutual consent.
- 5. Each party will establish a plan that describes the steps for referring members to the other party on a 24-hour, 7-day per week basis for emergencies.
- 6. Each party will provide to the other the programs (and phone numbers during business hours) designated for emergency, urgent or ambulatory care.

MEMORANDUM OF UNDERSTANDING BETWEEN HEALTH NET AND THE LOS ANGELES COUNTY DEPARTMENT OF MENTAL HEALTH AS THE LOCAL MENTAL HEALTH PLAN P. 5 of 5 $\,$

The attached "Matrix of Additional Responsibilities" describes additional responsibilities of each party under this MOU, and is hereby incorporated by reference.

IN WITNESS WHEREOF, the parties have executed this MOU on the date first written.

By

David Meadows

Vice President, California Health Programs

Health Net of California, Inc.

Ву

Date:

___Date: 7/17/01

7-27-0

Marvin J. Southard, D.S.W.

Director

Los Angeles County, Department of Mental Health

ATTACHMENTS: MMCD Policy Letter No. 00-01

| Health Net | tient and Health Net will cover physical health care services and outpatient mental health services Two-Plan within the scope of the member's PCP practice in accordance with Health Net's contract with the State Department of Health Services. PCPs will provide medical care and care for manyll will provide medical care and care for manyll | iental on- egular | Access to the PCP and emergency physical health care services will be made available to Health Net Members 24 hours a day, 7 days week and Health Net will provide a toll free telephone number. | Mhen possible, within the scope of the PCP's practice. The PCP will address the following conditions as they arise in the course of treating physical illness: | ment 1. Psychological factors affecting a physical condition/illness. | 2. Psychological symptoms precipitated by physical conditions/illnesses. |
|---|--|--|--|--|---|---|
| Department of Mental Health (DMII)/Local Mental | LMHP will provide and be responsible for outpatient and inpatient mental health specialty services to Medi-Cal beneficiaries enrolled in Health Net through the Two-Plan Model pursuant to this MOU and State law. Services will be provided with or without a referral by a Health Net Primary Care Physician (PCP) or Health Net staff. | LMHP will be responsible to provide emergency mental health services 24 hours a day, 7 days a week and nonemergency specialty mental health services during regular business hours which meet the criteria outlined in (California Code of Regulations Title 9, Chapter II, Subchapter 2, Article 2, Section 1830.205.) These criteria are | summarized in Attachment A. Attachment A will be updated to reflect changes in State law. A member may receive LMHP services for an included diagnosis when an excluded diagnosis is also present, as defined by State law. | EPSDT beneficiaries with an included diagnosis and a substance related disorder may receive specialty mental health services directed at the substance use component. The intervention must be consistent with, and necessary to | the attainment of, the specialty mental health treatment goals. | LMHP is responsible for inpatient mental health hospitalization for members requiring inpatient hospitalization who meet medical necessity criteria. (CCR |
| | Services Provided | | | | | |

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| Health Nea | t non-physical conditions. | Contracting Providers will work with MHP to refer Members for excluded diagnosis. | Health Net's PCPs will arrange psychological assessments of members to: | 1. Rule out general medical conditions causing psychological symptoms, or | 2. Rule out mental disorders and/or substance related disorders caused by a general medical condition. | The PCP will identify and treat those general medical conditions that are causing or exacerbating psychological symptoms or refer | the member for specialty physical health care for such treatment. | | |
|--|--|---|--|--|---|---|--|--|--|
| Department of Mental Health (DMH)/Local Mental Health Plan (LMHP) | 1830.205). LMHP and PCPs will assist in obtaining inpatient hospitalization, as necessary. | The CTTTA | LIMITE will arrange and be responsible for specialty mental health services to evaluate and triage members whose psychological condition(s) would not be responsive to | physical health care services. LMHP specialists will evaluate and diagnose a member's | symptoms, level of impairment and focus of intervention to determine if a member meets LMHP medical necessity criteria for LMHP services. | If the criteria for referral to specialty mental health services are not met LMHP and its providers may assist the PCP in identifying appropriate alternate treatment services. | When LMHP medical necessity criteria are not met, LMHP will refer member back to the member's health plan and the referring PCP (and may assist with referral to an appropriate mental health provider). | With a member's consent or as otherwise permitted by applicable law, and when requested by the member, the PCP and/or Health Net, the evaluation results, diagnoses, need for services, and recommendations for an appropriate provider to treat the member's symptoms will be forwarded to the referring PCP. | |
| Secretary Dec. 1.1.3 | continued) | Discrete Frofration | and Triage | | | | | | |

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| | Department of Mental Health (DMH)/Local Mental Health Plan (LMHP) | HealthNet |
|------------------------|---|--|
| Keterrals | LMHP will accept Medi-Cal referrals from Health Net, Health Net Contracted PCPs, hospitals and/or members (self-referral) for determination of LMHP medical necessity and provide mental health specialty diagnostic evaluation services. LMHP may triage members seeking mental health services accordingly. | Following a PCP's diagnostic evaluation, thePCP will refer to LMHP a member whose psychological condition would not be responsive to physical health care or primary mental health services. LMHP will |
| | When all medical necessity criteria are met, LMHP will arrange for the provisions of specialty mental health services by a LMHP provider in a timely manner. | subsequently triage the member to determine if LMHP medical necessity criteria are met. Health Net will distribute reproducible MHP referral forms and instructions to contracted |
| | When a Medi-Cal beneficiary, including Plan members, who does not meet the impairment criteria of Title IX, Chapter 11, Section 1830.205, and continue to seek or need treatment, the LMHP will refer the beneficiary to an | PCPs. Health Net will inform PCPs of mental health referral criteria. |
| | alternate provider, provide the treatment if appropriate, or refer the beneficiary back to the Plan PCP, as appropriate. As appropriate, LMHP will notify a member's PCP when requests for many balls. | When LMHP informs Health Net that a member does not meet LMHP medical necessity criteria and provides results of psychological assessment and provider |
| | member through self-referral or through any other outside agency (including schools, courts of law, correctional facilities.) A signed release of information must be obtained before information can be shared. | recommendations, as appropriate, Contracting Providers will work with MHP to assure Members receive appropriate referrals to alternate providers for excluded diagnosis and specialty care. |
| Service Authorizations | LMHP will authorize evaluation and/or treatment services by mental health specialists, who are credentialed by and contracted with LMHP, for services that meet LMHP medical necessity criteria. This will be done through the | Health Net will arrange medical assessment and/or treatment of covered physical health services by contracted providers. |
| | Services will be rendered according to LMHP service thresholds. Emergency services will be provided in | If a dispute occurs between the member, Health Net or the LMHP, the member will continue to receive medically necessary care |

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| Health Net | and mental health care services, including prescriptions, until the dispute is resolved. | When LMHP determines that EPSDT supplemental services criteria are not met, and the child's condition is not CCS-eligible, Health Net will refer the child to the PCP for treatment of conditions within the PCP's scope of practice. Referrals to Medi-Cal Fee-For-Service Program providers or an appropriate linked program will be made for treatment of conditions outside the PCP's scope of practice. | | The PCP will monitor the effects and side effects of psychotropic medications for members whose psychiatric conditions are treated by the PCP. |
|---|---|---|---|--|
| Department of Mental Health (DMH)/Local Mental Health Plan (LMHP) | If a dispute occurs between the member, Health Net or the LMHP, the member will continue to receive medically necessary care and mental health care services, including prescriptions, until the dispute is resolved. | IMHP will utilize Medi-Cal Fee-For-Service Program medical necessity criteria established for EPSDT supplemental services to determine if a child (up to 21 years of age) is eligible for EPSDT supplemental services. If these criteria are met, IMHP is responsible for arranging EPSDT supplemental services provided by specialty mental health professionals or other appropriate providers. IMHP is responsible for paying for EPSDT supplemental services, which are part of the member's specialty mental health treatment. | If EPSDT supplemental service and LMHP medical necessity criteria are not met, LMHP will refer children who have a CCS-eligible condition requiring specialty mental health services to their PCP's for referral to CCS. LMHP will refer children who do not have a CCS-eligible condition to the PCP with recommendations for mental health treatment and inform the member's PCP of the referral. | LMH providers will prescribe, as medically appropriate psychotropic medications for Health Net members under treatment and monitor the effects and side effects of such medications. |
| Service Authorizations | (continued) | EPSDT Supplemental Services and CCS | Decel | r sychotropic Medications and Formulary |

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| | Department of Mental Health (DMH)/Local Mental | Health Net |
|--|---|---|
| Psychotropic Medications and Formulary (continued) | IMHP providers will bill Fee-For-Service Medi-Cal Program for drugs identified as carved-out from Health Net financial responsibility. LMHP providers will refer members receiving outpatient specialty mental health services to Health Net contracted pharmacies for provision of psychotropic medications NOT carved-out from Health Net's responsibility. | Health Net will: Provide the MHP a list of participating pharmacies on a yearly basis. Provide MHP with Health Net's, Molina and Universal Care Health Plans Recommended Drug List for Medi-Cal and information regarding authorization |
| | Using mutually agreed upon protocols and procedures, LMHP providers will prescribe non-psychotropic medication for members only in consultation and with approval of a member's PCP. | requirements. • Provide MHP with the list of psychotropic medications carved-out from Health Net's financial responsibility under its Medi-Cal Contract with the State. |
| | The LMHP will provide on a yearly basis the names and qualifications of physicians who are eligible to prescribe medications to Health Net Members. | Health Net will cover medically necessary medications for the treatment of physical conditions and mental health conditions treated through primary care in accordance with the requirements of its Medi-Cal contract with the State. |
| | | Health Net shall cover psychotropic medications prescribed by out-of-plan psychiatrists for the treatment of psychiatric conditions and not otherwise excluded from its Medi-Cal contract with the State. |
| Laboratory, Radiological and Radioisotope Services | LMHP providers will utilize Health Net contracted laboratories, for laboratory tests needed in connection with the administration and management of psychotropic medications. | Health Net will provide a directory of contracted laboratories to LMHP at least annually with updates as indicated by changes to the directory. |

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| Health Net is financially responsible for medically necessary laboratory, radiological and radioisotope tests required to administer and manage psychotropic medications prescribed for members by LMHP providers as described. Health Net contracted PCPs will coordinate these services with MHP providers. | PCPs will arrange laboratory tests necessary for the treatment of physical conditions and they will be covered by Health Net. | Per contract with SDHS, Health Net is financially responsible for the facility charges resulting from emergency services and care of a Member whose condition meets MHP medical | reconstry cluena when such services do not result in the admission of the member for psychiatric services or when such services tesult in admission of the Member for psychiatric inpatient hospital services at a different facility. | Health Net is financially responsible for professional services, except those of a mental health specialist, when required for the emergency services and care of a Member whose condition meets MHP medical necessity criteria. | Health Net is financially responsible for the facility charges and the medical professional |
|---|---|--|--|--|---|
| Department of Mental Health (DMH)/Local Mental Health Plan (LMHP) Laboratory specimen submission should include managed care plan information but not limited to appropriate member identification with submission member name, date of birth, Social Security Number, and Health Net name. | I MITH | LIMITY Will be responsible for psychiatric consultation charges. Any separately billable facility charges connected with an emergency room psychiatric consultation, when the consultation results in an inpatient admission will be paid by LMHP. | LMHP is not responsible for medical services or non-psychiatric facility charges. | | |
| Laboratory, Radiological and Radioisotope Services (continued) | Emergency Room | Services – In and Out | | | |

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| | Department of Mental Health (DMH)/Local Mental Health Plan (LMHP) | |
|-----------------------|--|--|
| Emergency Room | | |
| Services - In and Out | | services required for the emergency services |
| of Area (continued) | | and care of a Member with an excluded |
| , | | diagnosis or a Member whose condition does |
| | | not meet the MHP medical necessity criteria |
| | | and such services do not result in the admission |
| | | of the Member for psychiatric inpatient |
| Nursing Facility | I MHP will reimbures (news) | hospital services. |
| Services | specially mental health services for members required in | Health Net will arrange and pay for covered skilled nursing facility (SNF) services for |
| | م در در المراجع المراج | Members who meet the medical necessity |
| | Members in nursing facilities for physical health conditions | criteria for the month of admission plus one |
| | needing specialty mental health services will be provided by | |
| | THE TANISIT. | Health Net will arrange for disenrollment from |
| | | the health plan for those Members who need |
| | | SNF services for a period of time expected to |
| | | exceed Health Net's obligation of coverage. |
| | | Health Net will coordinate the member's |
| | | orderly transfer to the Medi-Cal Fee-For- |
| · · · | | Service system upon disenrollment and will |
| | | arrange medically necessary services until the |
| Medical | LMHP will arrange and be removed the Control | disentoliment is effective. |
| Transportation | of members needing medical transportation from one | Health Net will cover transportation of |
| | psychiatric inpatient hospital to another psychiatric inpatient | a osychiatric inparient bosnital on 241, 2, 2, 1 |
| | hospital or another type of 24-hour facility for mental | facility for mental health care to an innation |
| | nearthcare, if the transfer is to reduce psychiatric inpatient costs for LMHP. | hospital as medically necessary. |
| | | TI TI NI TO THE PERSON OF THE |
| | | realth liver will also cover transportation of |
| | | members fequiring medically necessary medical |
| | 0.50 7.000 | range of the state |

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| | Deparament of Mental Health (DMH)/Local Mental Health Plan (LMHP) | Health Net |
|---|--|--|
| Medical | | Developer of province of the second of the s |
| continued) | | psychiatric hospital required to address the members' change in psychiatric condition, but |
| Home Health Services | If LMHP determines a member requires medically necessary specialty mental health services as part of home health care, LMHP will arrange and be responsible for these services. | not if the transfer is to reduce psychiatric inpatient costs for LMHP. The PCP may request home health services for members with physical health conditions. |
| | | Health Net will cover and pay for home health services when medically necessary to meet the physical health care needs of homebound members in accordance with its contract with the State. |
| | | Health Net is not responsible to pay for home health services covered by other program/agencies or any other specialty mental |
| Services for Developmentally Disabled Members & Early Start Services | LMHP will refer members under its care with developmental disabilities to Regional Centers for non-medical services, such as respite care, out-of-home placement, supportive living services and Early Start services, if such services are needed. As appropriate, LMHP will inform Health Net and PCP of such referrals. | PCPs will refer members with developmental disabilities to Regional Centers for those non-medical services, such as respite care, out-of-home placement, supportive living services and Early Start services, if such services are needed. |
| Inpatient Psychiatric History and Physicals | emergent physical conditions, LMHP providers to perform medical histories ions required for hospital admission ces. | PCPs will arrange and be responsible for medical histories and physical examinations required for hospital admissions for mental health services. |
| | In the event such a provider is unable to perform a medical history and physical examination for a psychiatric admission | If a Health Net PCP is not available to provide a medical history and physical for a psychiatric |

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| nade by the facility | ovider for Medi-Cal Fee-For- alth services within | | | ılly necessary services to Health uatric outpatient | mission, or as able law, the inical and other | shared between ation of care. |
|---|---|---|---|--|---|--|
| Health Net admission and a request is made by the facility within 24 hours of admission, Health Net will | reimburse a non-network provider for professional services at the Medi-Cal Fee-For-Service Program rate. PCPs will provide mental health services within their scope of practice. | | | Health Net will cover medically necessary ancillary physical health care services to Health Net members receiving psychiatric outpatient hospital services. | With a member's written permission, or as otherwise permitted by applicable law, the identification of a member, clinical and other | Perfinent information will be shared between LMHP and PCPs for coordination of care. |
| Department of Mental Health (DMH)/Local Mental Health Plan (LMHP) of a member within 24 hours of admission, the LMHP may use a non-Health Net provider. Reimbursement will be made by Health Net at the Modi Caller. | LMHP will directly employ or contract with specialty mental health professionals who have sufficient capacity and willingness to serve members who meet LMHP medical necessity criteria. LMHP will provide all specialty mental health services | Emergency services will be provided 24 hours daily. LMHP will provide 24 hour; seven days a week relembone | and walk-in access for all Medi-Cal beneficiaries needing medically necessary specialty mental health services. Health Net may access specialty mental health services information on behalf of the members | The MHP will provide hospital ancillary mental health services to Health Net members when medical necessity criteria are met. Hospital based ancillary services, x-ray, Electroconvulsive Therapy (ECT), Magnetic Resonance Imaging (MRI), that are received by a beneficiary admitted to a hospital, other than routine bostical. | LMHP will make available to Health Net non-identifying patient information and aggregate reports for purposes of review, evaluation, and accountability at least quarterly. | All member specific information will be kept confidential. With a member's written consent or as otherwise permitted by applicable law, the identification of a member. as well as |
| Inpatient Psychiatric History and Physicals (continued) | Specialty Mental Health Provider Network and Member Access to Services | | | Hospital Based Ancillary Services | Data/Information Collection, Sharing, and Confidentiality | |

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|--|--|--|--|---|---|---|---|---|---|---|
| | | HP with a l | st quarterly or this MO | have sufficio programs 2 HP mental 1 | cocess for Li tion on the | , medicado | ntracting ty of LMHI is for consu | ate in case ppropriate | • | IHP a prov ory for facili 10t meet th |
| | | provide LM on staff nam | meet at lea: aff to monit | n staff will anaged Care of the LM | levelop a proive consulta | PCPs. | nform its co he availabili psychologis: | will particiț LMHP as a | | ovide to LA PCP directo whom do |
| Health Not- | 7 (2) (3) (3) (3) (3) (3) (3) (4) (3) (4) (4) (4) (4) (4) (4) (4) (4) (4) (4 | Health Net will provide LMHP with a list of Health Net liaison staff names and phone numbers. | Liaison staff will meet at least quarterly with LMHP liaison staff to monitor this MOU. | Health Net liaison staff will have sufficient knowledge of Managed Care programs and referral processes of the LMHP mental health | System in Los Angeles County. Health Net will develop a process for LMHP providers to receive consultation on the member's physical health and it. | prescribed by the PCPs. | Health Net will inform its contracting providers about the availability of LMHP psychiatrists and psychologists for consultation. | Health Net PCPs will participate in case consultation with LMHP as appropriate and as | mutually agreed. | Health Net will provide to LMHP a provider manual and /or a PCP directory for facilitating referral of patients whom do not meet the criteria for LMHP. |
| Ē | | He. He. | Liai LM | Hea kno refe | Hea Prov | pres | | Heal cons | mutc | Heal manu refer |
| Department of Mental Health (DMI1)/Local Mental Health Plan (LMHP) | between LMHP and PCPs for coordination of care. | LMHP haison staff will be trained and will have sufficient knowledge of Health Net and Medi-Cal Managed Care, to ensure appropriate and effective referrals. | Liaison staff will meet at least quarterly with Health Net to monitor this MOU. | | LMHP will develop a process for Health Net PCP's to receive mental health consultation about Health Net members. | LMHP will provide a list of mental health providers and | assist the PCP in making referrals of members to other mental health providers when the member does not meet the criteria for LMHP. | LMHP physicians will participate in case consultation with Health Net PCPs as appropriate and mutually agreed. | LMHP will provide a list of mental health providers for PCP | referral of members who do not meet the criteria for LMHP. |
| Data/Information | (continued) | LIAISOIIS | | | Clinical Consultation and Consensus | | | | | |

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| | Department of Mental Health (DMH)/Local Mental Health Plan (LMHP) | Health Net |
|--------------------------------|---|---|
| Provider Training | LMHP will train its providers on Medi-Cal Managed Care and how to coordinate care with Health Net PCPs. | Health Net will educate its PCPs on specialty mental health services provided by LMHP and |
| | LMHP will assist Health Net in training Health Net PCPs about mental health specialty services provided through LMHP and coordinating care. | how to coordinate care with LMHP. Health Net will assist LMHP in training LMHP providers about coordinating care with Health |
| Onality Accusage | LMHP will assist with training for Health Net PCP's concerning mental health access and process issues. | ר. דעני |
| Management/Quality Improvement | Conforming to the standards of the National Committee on Quality Assurance, LMHP will operate a Quality Assurance/Quality Improvement program. | Health Net will involve LMHP in relevant aspects of its Quality Management /Quality Improvement program, as may be mutually |
| | LMHP will involve Health Net in relevant aspects of its Quality Assurance / Quality Improvement program. | agrecd. |
| Complaints and Grievances | The LMHP will ensure that Medi-Cal beneficiaries and providers are provided with written information on the appeal procedures. LMHP will establish a process for Medi-Cal beneficiaries and providers to register complaints regarding any aspect of the specialty mental health care they receive or fail to receive from the LMHP. LMHP will provide Health Net with the LMHP compliant/grievance telephone number for members. | Health Net will make available the appeal procedure to Members and provider. Health Net will maintain a process for members and providers to register complaints regarding any aspect of the health care they receive under the health plan. Health Net will provide LMHP with the Health Net complaint/grievance telephone number for members. |
| Organizational Dispute | LMHP and Health Net will develop a dismute recolution | 11. 13 NY 1118 KW |
| Resolution | process, which both parties will utilize to seek resolution to disputes (if any), which may arise between them. | realth Net and LMHP will develop a dispute resolution process, which both parties will utilize to seek resolution to disputes (if any) |
| | When the LMHP has a dispute with Health Net that cannot be resolved to the satisfaction of the LMHP, under their respective contracts with the State, the LMHP may submit a | which may arise between them. When Health Net has a dispute with the LMHP that cannot be resolved to the |
| | \dashv | saustaction of Health Net, under their |

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| Garag | | | | | | | |
|---|---|---|--|---|--|--|--|
| PicalifiNct | respective contracts with the State, Health Net may submit a request for resolution to the characteristics. | Department of Health Services (DHS). | A request for resolution will be submitted by Health Net to the respective department within 30 calendar days of the dispute resolution | process between the parties, in accordance with Title 9, Section 1850.505. | If a dispute arises between Health Net and LMHP the member will continue to receive medically necessary specialty mental health | services, physical health care services, or related prescription drugs, laboratory, radiological or radioisotope services until the dispute is resolved. | Please refer to Health Net's problem resolution policy and procedure. |
| Department of Mental Health (DMH)/Local Mental Health Plan (LMHP) | Resolution (continued) Health (DMH). | A request for resolution will be submitted by LMHP to the | respective department within 30 calendar days of the dispute resolution process between the parties, in accordance with Title 9, Section 1850.505. | If a dispute arises between LMHP and Health Net the member will continue to receive medically necessary | specialty mental health services, physical health care services, or related prescription drugs, laboratory, radiological or radioisotope services until the dispute is resolved. | | |
| | Organizational Dispute Resolution (continued) | | | | | | |



ALLIED PHYSICIANS OF CALIFORNIA IPA

1668 South Garfield Ave., 2nd Fl, Alhambra, CA 91801 Phone (626) 282-0288 • Fax (626) 943-6369

February 3, 2012

Vartuhi Vartanyan Regional Network Director Health Net of California 1055 E. Colorado Blvd., Suite 300 Pasadena, CA 91106

Re: Letter of Commitment for Dual Eligible Demonstration Pilot

Dear Vartuhi:

On behalf of Allied Physicians of California, I am expressing our interest and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles County, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). We are interested in participating in this pilot with Health Net. While the details of our participation and relationship remain to be negotiated, we are committed to continuous collaboration with Health Net toward a successful conclusion. Additionally, we understand that any agreement entered into for the purposes of participating in the Dual Eligible provider network, shall comply with all of the requirements and regulations established by DHCS and CMS.

Allied Physicians of California is committed to improving the health status of the diverse communities that we collectively serve. We look forward to working closely with Health Net on the Dual Eligible Demonstration Pilot as a community healthcare partner to achieve greater coordination of benefits, access to care and improved health outcomes.

Please feel free to contact me at 626.943.6228 regarding this letter of commitment and support.

Sincerely,

Thomas Lam, M.D., M.P.H. Chief Executive Officer

AltaMed

January 27, 2012

Health Net, Inc Hugo Florez, Region Network Director Provider Network Management - GLA Region 1055 E. Colorado Blvd., Suite 300 Pasadena, CA 91325



Re: Letter of Commitment for Dual Eligible Demonstration Pilot

Dear Mr. Florez:

On behalf of AltaMed Health Services Corporation, Inc., (AltaMed) I am expressing our interest and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles County, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). We are interested in participating in this pilot with Health Net. While the details of our participation and relationship remain to be negotiated, we are committed to continuous collaboration with Health Net toward a successful conclusion. Additionally, we understand that any agreement entered into for the purposes of participating in the Dual Eligible provider network, shall comply with all of the requirements and regulations established by DHCS and CMS.

AltaMed is committed to improving the health status of the diverse communities that we collectively serve. We look forward to working closely with Health Net on the Dual Eligible Demonstration Pilot as a community healthcare partner to achieve greater coordination of benefits, access to care and improved health outcomes.

Please feel free to contact Martha Santana-Chin, Vice President, Provider Network Operations and Development at (323.622.2496) regarding this letter of commitment and support.

De Roll

Cástulo de la Rocha, J.D.

President & CEO

Sincere



January 27, 2012

Carol Aroyan Vice President, Provider Network Management Health Net of California 1055 E. Colorado Blvd, Ste 300 Pasadena, CA 91106

Re: Letter of Commitment for Dual Eligible Demonstration Pilot

Dear Carol:

On behalf of the AppleCare Medical Groups, I am expressing our interest and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles County, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). We are interested in participating in this pilot with Health Net. While the details of our participation and relationship remain to be negotiated, we are committed to continuous collaboration with Health Net toward a successful conclusion. Additionally, we understand that any agreement entered into for the purposes of participating in the Dual Eligible provider network, shall comply with all of the requirements and regulations established by DHCS and CMS.

The AppleCare Medical Groups are committed to improving the health status of the diverse communities that we collectively serve. We look forward to working closely with Health Net on the Dual Eligible Demonstration Pilot as a community healthcare partner to achieve greater coordination of benefits, access to care and improved health outcomes.

Please feel free to contact me at (714) 443-4502 regarding this letter of commitment and support.

Sincerely,

Vinod Jivrajka, MD

President/CEO

AppleCare Medical Groups

(714) 443-4502

Doctor.vinod@applecaremedical.com



Canyon Country

17909 W. Soledad Cyn Rd Canyon Country, CA 91387 (661) 250-5200

Copper Hill

27924 Seco Canyon Rd Santa Clarita, CA 91350 (661) 513-2100

Mission Hills

11211 Sepulveda Blvd. Mission Hills, CA 91345 (818) 365-9531

11165 Sepulveda Blvd. Mission Hills, CA 91345 (818) 365-9531

Northridge

18460 Roscoe Blvd. Northridge, CA 91325 (818) 734-3600

Porter Ranch

19950 Rinaldi St. Porter Ranch, CA 91326 (818) 403-2400

San Gabriel

207 S. Santa Anita St San Gabriel, CA 91776 (626) 576-0800

Simi Valley (opening in 2011)

2655 First St Simi Valley, CA 93065 (805) 206-2000

Valencia I

26357 McBean Pkwy Valencia, CA 91355 (661) 222-2600

Valencia II

25775 McBean Pkwy Valencia, CA 91355 (661) 222-2600

Valencia III

23929 McBean Pkwy Valencia, CA 91355 (661) 222-2600 - SENT VIA E-MAIL -

February 3, 2012

Monique Florez Regional Network Director Provider Network Management Health Net of California 21281 Burbank Blvd Woodland Hills, CA 91367 Mail Stop Code, CA-900-04-06 91367

Re: <u>Letter of Commitment for Dual Eligible Demonstration Pilot</u>

Dear Monique:

On behalf of Facey Medical Foundation, I am expressing our interest and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles County, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). We are interested in participating in this pilot with Health Net. While the details of our participation and relationship remain to be negotiated, we are committed to continuous collaboration with Health Net toward a successful conclusion. Additionally, we understand that any agreement entered into for the purposes of participating in the Dual Eligible provider network, shall comply with all of the requirements and regulations established by DHCS and CMS.

Facey Medical Foundation is committed to improving the health status of the diverse communities that we collectively serve. We look forward to working closely with Health Net on the Dual Eligible Demonstration Pilot as a community healthcare partner to achieve greater coordination of benefits, access to care and improved health outcomes.

Please feel free to contact me at (818) 837 - 2748 regarding this letter of commitment and support.

Sincerely,

Teresa David

Chief Operating Officer 15451 San Fernando Mission Blvd., Suite 200 Mission Hills, CA 91345

(818) 837 – 2748

Hesa David



February 1, 2012

Mr. Steve Tough President Health Net, Inc. 2025 Aerojet Road Rancho Cordova, California 95742

Re: Letter of Commitment for Dual Eligible Demonstration Pilot – Los Angeles County

Dear Mr. Tough:

On behalf of HealthCare Partners Medical Group, I am expressing our interest and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles County, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). We are interested in participating in this pilot with Health Net. While the details of our participation and relationship remain to be negotiated, we are committed to continuous collaboration with Health Net toward a successful conclusion. Additionally, we understand that any agreement entered into for the purposes of participating in the Dual Eligible Pilot Program, as a provider in the Health Net network, will require that we comply with all of the requirements and regulations established by DHCS and CMS specifically for this pilot program.

HealthCare Partners is committed to improving the health status of the diverse communities that we collectively serve. We look forward to working closely with Health Net on the Dual Eligible Demonstration Pilot as a community healthcare partner to achieve greater coordination of benefits, access to care and improved health outcomes.

Please feel free to contact me at (310) 354-4221 regarding this letter of commitment and support.

Sincerely,

Robert Margolis, MD

CEO

HealthCare Partners, LLC

8510 Balboa Boulevard #275 ◆ Northridge, CA 91325 ◆ (818) 357-5077 ◆ Fax (818) 357-5047

February 2, 2012

Mr. Steven D. Tough President, Government Programs Health Net, 2025 Aerojet Rd. Rancho Cordova, CA 95742

Re: Letter of Commitment for Dual Eligible Demonstration Pilot

Dear Mr. Tough:

On behalf of Heritage Provider Network, Inc. (HPN), I am expressing our interest and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles County, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). We are interested in participating in this Pilot to provide services on a full risk basis to dual beneficiaries that may be assigned to Health Net. While the details of our participation and relationship remain to be negotiated, we are committed to continuous collaboration with Health Net toward a successful conclusion. This commitment does not preclude HPN from seeking direct participation in the Dual Eligible Demonstration Pilot or partnering with other organizations selected to participate in Pilot. Additionally, we understand that any agreement entered into for the purposes of participating in the Dual Eligible provider network, shall comply with all of the requirements and regulations established by DHCS and CMS.

HPN is committed to improving the health status of the diverse communities that we collectively serve. We look forward to working closely with Health Net on the Dual Eligible Demonstration Pilot as a community healthcare partner to achieve greater coordination of benefits, access to care and improved health outcomes.

Please feel free to contact me at (916) 295-4069 regarding this letter of commitment and support.

Sincerely,

Richard Martin Vice President

Heritage Provider Network

(916) 295-4069

rmartin@heritagemed.com



P.O. Box 10718 - Beverly Hills, CA 90213

01/26/12

Hugo Florez Regional Network Director, provider Network management Health Net, Inc.. 1055 Colorado Blvd., Suite 300 Pasadena, CA 91325

Re: Letter of Commitment for Dual Eligible Demonstration Pilot

Dear Hugo:

On behalf of the Hispanic Physician IPA (HPIPA), I am expressing our interest and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles County, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). We are interested in participating in this pilot with Health Net. While the details of our participation and relationship remain to be negotiated, we are committed to continuous collaboration with Health Net toward a successful conclusion. Additionally, we understand that any agreement entered into for the purposes of participating in the Dual Eligible provider network, shall comply with all of the requirements and regulations established by DHCS and CMS.

The Hispanic Physician IPA is committed to improving the health status of the diverse communities that we collectively serve. We look forward to working closely with Health Net on the Dual Eligible Demonstration Pilot as a community healthcare partner to achieve greater coordination of benefits, access to care and improved health outcomes.

Please feel free to contact me at (213) 637 0933 regarding this letter of commitment and support.

Sincerely,

Daniel Dunkelman, M.D., Medical Director, HPIPA February 3, 2012

Vartuhi Vartanyan Regional Network Director Health Net of California 1055 E. Colorado Blvd., Suite 300 Pasadena, CA 91106

Re: Letter of Commitment for Dual Eligible Demonstration Pilot

Dear Vartuhi:

On behalf of Pacific IPA, I am expressing our interest and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles County, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). We are interested in participating in this pilot with Health Net. While the details of our participation and relationship remain to be negotiated, we are committed to continuous collaboration with Health Net toward a successful conclusion. Additionally, we understand that any agreement entered into for the purposes of participating in the Dual Eligible provider network, shall comply with all of the requirements and regulations established by DHCS and CMS.

Pacific IPA is committed to improving the health status of the diverse communities that we collectively serve. We look forward to working closely with Health Net on the Dual Eligible Demonstration Pilot as a community healthcare partner to achieve greater coordination of benefits, access to care and improved health outcomes.

Please feel free to contact me at (626) 652-3525 regarding this letter of commitment and support.

Sincerely, Peder Lindon

Peder Lindblom Executive Director

brand new day

Hugo Flores Health Net Hugo.Flores@healthnet.com

January 31, 2012

Re: Letter of Commitment for Dual Eligible Demonstration Pilot

Dear Mr. Flores:

On behalf of Universal Care/Brand New Day, I am expressing our interest and intended involvement in the Dual Eligible Demonstration Pilot for Los Angeles County, as outlined by the State of California Department of Health Care Services (DHCS) in their recently released Request for Solution (RFS). We are interested in participating in this pilot with Health Net. While the details of our participation and relationship remain to be negotiated, we are committed to continuous collaboration with Health Net toward a successful conclusion. Additionally, we understand that any agreement entered into for the purposes of participating in the Dual Eligible provider network, shall comply with all of the requirements and regulations established by DHCS and CMS.

Universal Care/Brand New Day is currently operating a Chronic Special needs plan for the Seriously and Persistently Mentally ill. The population serviced also includes individual's disabled due to a developmental disability, and has strong support systems for individuals living in group homes. Universal Care/Brand New Day is committed to improving the health status of the diverse communities that we collectively serve. We look forward to working closely with Health Net on the Dual Eligible Demonstration Pilot as a community healthcare partner to achieve greater coordination of benefits, access to care and improved health outcomes.

Please feel free to contact me at (562) 981-4004 regarding this letter of commitment and support.

Sincerely,

ffrey Davis

#OC









Section 2, Attachment 21

Project Abstract and Profile

The project vision is a partnership between Resources for Independence Central Valley (RICV), Independent Living Center of Kern County (ILCKC), Westside Center for Independent Living (WCIL), Community Rehabilitation Services (CRS), Disabled Resource Center, Inc. (DRC), Southern California Rehabilitation Services (SCRS), Independent Living Center of Southern California (ILCSC) and Health Net Community Solutions (HNCS) to create an innovative health home that bridges health and Independent Living Center (ILC) program coordination.

Services subject to health navigation and ILC program coordination would include: medical, health education, health care self-management, mental health, transition services, daily living activities, job development, housing resources, peer support and assistive technology. This in turn, would re-engineer service coordination by bridging health and ILC program coordination for disabled consumers who have Medi-cal or Medicare coverage. The project is a strategic match for the partner organizations which would enhance capacity and the ability to manage services within the current delivery system while maintaining the ILC mission of advocating for independence. The project would fund up to 14 Health Navigators to be located at the designated ILCs in Los Angeles County, Fresno County and Kern County in California and 1 Project Director for 3 years. Health Net Community Solutions provides both Medi-Cal and Medicare managed care programs to beneficiaries in each of these counties. Health Net plans to provide







in-kind health education and care coordination training to the Health Care Navigators.

The goals of proposed project "Bridging Health Navigation and ILC Program Coordination are (1) to promote wellness creating a model that integrate and coordinates health and ILC Program services in a consumer-centered setting; (2) base Health Care Navigators at ILCs to assist consumers in navigating the health care delivery system with the aim of promoting wellness and improving health outcomes for consumers with a variety of disabilities; and (3) to reduce overall health care costs by promoting wellness and coordinating services as a core part of the ILC Program. The total budget is \$3,389,159 million. The number of projected participants is 10,000 which average 1,640 per center in Los Angeles County where a greater number of consumers reside and an average of 900 per center at the two Central Valley ILCs. The projected total cost of care savings after the third year is approximately \$694,335.

The model design is a multi-disciplinary approach to re-engineering service coordination by providing enhanced access to health care as an integral component of the ILC Program with an innovative workforce of Health Care Navigators in a consumer-centered setting. This service coordination enhancement would also be supported by a Project Director, which will provide liaison and support services for the Health Care Navigators and be the primary point of contact to the health plan Public Programs Administrator.

The proposed model would transform the existing health workforce by creating this innovative Health Care Navigator to be located at the designated ILCs. The Health Care Navigators will promote wellness and health care coordination after









extensive training in health education, health promotion and care coordination in a team-based environment. The proposed project "Bridging Health Navigation and ILC Program Coordination" will address and impact the Health Care Innovation Challenge three-part aim of better health, better health care, and lower costs through an enhancement of service coordination for Medi-Cal and Medicare participants.

A NATIONAL MODEL FOR BUILDING A PERSON-CENTERED, COMMUNITY-BASED HEALTH HOME FOR PERSONS WITH COMPLEX CHRONIC CONDITIONS

Project Abstract

The California Association for Adult Day Services (CAADS), a nationally acclaimed non-profit that supports the development of adult day services as an alternative to institutional care, and **Health Net**, a managed care leader and innovator in California, jointly present this proposal to implement a cutting edge model – the *Community Health Home* – to link managed care primary care physicians and Community-Based Adult Services (CBAS) providers together to achieve better patient care, better patient health, and lower patient care costs.

The *Community Health Home* takes two systems, the adult day health care (ADHC) model and the managed care system with its network of physicians, each with strengths and expertise in different arenas, and unites them to keep the participant in the center and the model in the community – the *new health home neighborhood*.

This innovative model builds on ADHC's decades of experience in integrating health care and long-term services and supports by adding a Community Health Home Coordinator in eight CBAS sites in Los Angeles County to provide enhanced care coordination for approximately 600 high-care, high-risk Medicaid beneficiaries enrolled in Health Net managed care.

The *Community Health Home* expands on the ADHC model of team-based, person-centered care, which is vital, but under-utilized in California's broader health care continuum. This project has as its goals to:

- 1. implement the design of a highly desirable, effective, person-centered, community-based health home;
- 2. reduce acute care admissions, hospital lengths of stay, emergency room visits, and post-acute stays, resulting in lower health care costs;
- 3. improve the skills and knowledge of formal and informal caregivers through an education, training, and monitoring program that focuses on improving self-management skills;
- 4. increase participant, formal and informal caregivers, and primary care physician satisfaction rates as a result of participating in the *Community Health Home* program; and
- 5. replicate the model within other managed care organizations and adult day health programs in various locations throughout California and the nation.

Reduced emergency department visits, acute care admissions, post-acute services (e.g., skilled nursing facility) and outpatient services will result in an approximate 10% decrease in participant health care costs over 36 months. The project budget of \$4,476,511 will be used to deploy a new highly trained workforce of eight fulltime registered nurses as Community Health Home Coordinators for the grant project period, and implement a formal and informal education and training program for the medical professionals and caregivers associated with this project.

CAADS and Health Net are committed to enhanced care coordination for CBAS participants and to ensuring sustainability and replicability of this model.

| Health Net DRAFT Demonstration Implementation Work Plan - LA County | | Section 6, Attachi | ment 22 |
|---|---|--------------------|-------------|
| ID | Task Name | Start | Finish |
| 0 | LA County Dual Eligible Pilot (DEP) Launched | Wed 2/1/12 | Mon 7/1/13 |
| 1 | DEP Launch Assumptions | Fri 3/30/12 | Tue 1/1/13 |
| 2 | LA County DEP awarded | Fri 3/30/12 | Fri 3/30/12 |
| 3 | Start of DEP Implementation | Mon 4/2/12 | Mon 4/2/12 |
| 4 | Start of DEP Enrollment | Mon 10/1/12 | Mon 10/1/12 |
| 5 | Readiness Review | Mon 7/30/12 | Fri 9/28/12 |
| 6 | Start of DEP Health Care Delivery | Tue 1/1/13 | Tue 1/1/13 |
| 7 | DEP program design completed (pre-implementation) | Wed 2/1/12 | Fri 3/30/12 |
| 8 | Finalize and approve DEP objectives and goals | Wed 2/1/12 | Fri 3/30/12 |
| 9 | Gather DEP program requirements | Wed 2/1/12 | Fri 3/30/12 |
| 10 | Identify body of law, regulatory, Fed & State requirements | Wed 2/1/12 | Fri 3/30/12 |
| 11 | Identify DEP membership, geography and transaction volume expectations | Wed 2/1/12 | Fri 3/30/12 |
| 12 | Identify program performance and evaluation requirements | Wed 2/1/12 | Fri 3/30/12 |
| 13 | Identify business partner and business interface requirements | Wed 2/1/12 | Fri 3/30/12 |
| 14 | Identify stakeholder and advocacy group engagement and communication requirements | Wed 2/1/12 | Fri 3/30/12 |
| 15 | Identify operational requirements | Wed 2/1/12 | Fri 3/30/12 |
| 16 | Identify technology system and interface requirements | Wed 2/1/12 | Fri 3/30/12 |
| 17 | Identify financial model requirements (revenue, risk sharing, G&A, etc.) | Wed 2/1/12 | Fri 3/30/12 |
| 18 | Identify benefit design requirements for optimizing enrollment into managed care | Wed 2/1/12 | Fri 3/30/12 |
| 19 | Identify enrollment strategy requirements | Wed 2/1/12 | Fri 3/30/12 |
| 20 | Identify DEP resource requirements | Wed 2/1/12 | Fri 3/30/12 |
| 21 | Identify DEP facilities requirements | Wed 2/1/12 | Fri 3/30/12 |
| 22 | Finalize and approve DEP business framework / architecture | Wed 2/1/12 | Fri 3/30/12 |
| 23 | Finalize and approve DEP responsibilities and assignments | Wed 2/1/12 | Fri 3/30/12 |
| 24 | Secure resources for key DEP governance and operating roles | Wed 2/1/12 | Fri 3/30/12 |
| 25 | DEP implementation mobilization completed | Wed 2/1/12 | Mon 4/2/12 |
| 26 | Finalize and approve DEP governance structure and processes | Wed 2/1/12 | Fri 2/17/12 |
| 27 | Conduct DEP implementation kick-off meeting | Wed 2/29/12 | Wed 2/29/12 |
| 28 | Secure resources for key implementation roles | Wed 2/29/12 | Fri 3/30/12 |
| 29 | Finalize and approve DEP Implementation Plan | Fri 3/30/12 | Fri 3/30/12 |
| 30 | DEP Project Management Office (PMO) established | Wed 2/1/12 | Mon 4/2/12 |
| 31 | PMO infrastructure Established | Fri 3/16/12 | Mon 4/2/12 |
| 32 | PMO team established | Mon 4/2/12 | Mon 4/2/12 |
| 33 | Identify PMO resources | Mon 4/2/12 | Mon 4/2/12 |
| 34 | Conduct PMO kick-off meeting | Mon 4/2/12 | Mon 4/2/12 |
| 35 | Schedule weekly PMO meetings | Mon 4/2/12 | Mon 4/2/12 |
| 36 | PMO tools developed and implemented | Fri 3/16/12 | Mon 4/2/12 |
| 37 | Implement PMO reporting tool | Mon 4/2/12 | Mon 4/2/12 |
| 38 | Develop implementation status report template | Fri 3/16/12 | Fri 3/16/12 |
| 39 | Develop PMO Policies and Procedures | Fri 3/30/12 | Fri 3/30/12 |
| 40 | Develop Fino Folicies and Frocedures Develop Communication Plan | Fri 3/30/12 | Fri 3/30/12 |
| 41 | Develop Communication Flair Develop Change Management Plan | Fri 3/30/12 | Fri 3/30/12 |
| 41 | Governance structure established | Wed 2/1/12 | |
| | J | | Mon 4/2/12 |
| 43 | Steering Committee established | Wed 2/1/12 | Tue 2/7/12 |

Page 1 of 8

| ricaicii | Net DRAFT Demonstration Implementation Work Plan - LA County | | |
|----------|--|--------------|--------------|
| ID | Task Name | Start | Finish |
| 44 | Determine steering committee participants | Wed 2/1/12 | Wed 2/1/12 |
| 45 | Conduct steering committee kick-off meeting | Tue 2/7/12 | Tue 2/7/12 |
| 46 | Schedule weekly steering committee meetings | Tue 2/7/12 | Tue 2/7/12 |
| 47 | Core Teams established | Mon 4/2/12 | Mon 4/2/12 |
| 48 | Determine core team participants | Mon 4/2/12 | Mon 4/2/12 |
| 49 | Develop core team charters | Mon 4/2/12 | Mon 4/2/12 |
| 50 | Conduct core team kick-off meetings | Mon 4/2/12 | Mon 4/2/12 |
| 51 | Schedule weekly core team meetings | Mon 4/2/12 | Mon 4/2/12 |
| 52 | Contractual / legal agreements to operationalize DEP established | Thu 9/20/12 | Mon 12/31/12 |
| 53 | Establish contract / legal agreements between Health Net and LA Care | Thu 9/20/12 | Thu 9/20/12 |
| 54 | Establish contract / legal agreements with CMS | Thu 9/20/12 | Thu 9/20/12 |
| 55 | Establish contract / legal agreements with DHCS | Thu 9/20/12 | Thu 9/20/12 |
| 56 | Establish contract / legal agreements with subcontracted health plans | Mon 12/31/12 | Mon 12/31/12 |
| 57 | Establish contract / legal agreements with LA County Health Dept | Mon 12/31/12 | Mon 12/31/12 |
| 58 | Establish contract / legal agreements with other necessary partners | Mon 12/31/12 | Mon 12/31/12 |
| 59 | DEP Functional teams established | Fri 3/30/12 | Mon 4/1/13 |
| 60 | DEP Finance function established | Mon 4/2/12 | Mon 12/31/12 |
| 61 | Finalize and approve finance function operating requirements | Mon 4/2/12 | Mon 12/31/12 |
| 62 | Finalize and approve finance function operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 |
| 63 | Finalize and approve finance function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 |
| 64 | Finalize and approve finance function staffing requirements | Mon 4/2/12 | Mon 12/31/12 |
| 65 | DEP Healthcare Ops functions established | Mon 4/2/12 | Mon 12/31/12 |
| 66 | DEP Provider Network Management function established | Mon 4/30/12 | Fri 9/28/12 |
| 67 | Finalize and approve provide network management operating requirements | Thu 5/31/12 | Thu 5/31/12 |
| 68 | Finalize and approve provider network management function IT systems requirements | Thu 5/31/12 | Thu 5/31/12 |
| 69 | Finalize and approve provider network management function staffing requirements | Thu 5/31/12 | Thu 5/31/12 |
| 70 | Finalize and approve provider network management operating policies and procedures | Fri 8/31/12 | Fri 8/31/12 |
| 71 | Finalize and approve provider training and education requirements | Fri 8/31/12 | Fri 8/31/12 |
| 72 | DEP Provider network established | Mon 4/30/12 | Fri 9/28/12 |
| 73 | Finalize and approve provider network sizing requirements | Mon 4/30/12 | Mon 4/30/12 |
| 74 | Provider network gap analysis completed | Mon 4/30/12 | Mon 4/30/12 |
| 75 | Provider network plan developed | Wed 5/30/12 | Wed 5/30/12 |
| 76 | Finalize and approve provider network objectives and goals | Wed 5/30/12 | Wed 5/30/12 |
| 77 | Determine methodologies for paying providers | Wed 5/30/12 | Wed 5/30/12 |
| 78 | Develop plan to engage with providers and encourage them to join the care network | Wed 5/30/12 | Wed 5/30/12 |
| 79 | Obtain information for configuration and credentialing of providers | Fri 8/31/12 | Fri 8/31/12 |
| 80 | Execute provider contracts; certify Medicare standards are met | Fri 8/31/12 | Fri 8/31/12 |
| 81 | Develop provider directory | Fri 8/31/12 | Fri 8/31/12 |
| 82 | Certify network adequacy [during Readiness Review] | Mon 7/30/12 | Fri 9/28/12 |
| 83 | DEP Medical Management function established | Mon 4/2/12 | Mon 12/31/12 |
| 84 | DEP Quality Management function established | Wed 5/30/12 | Mon 12/31/12 |
| | Finalize and approve quality management function operating requirements | Wed 5/30/12 | Wed 5/30/12 |
| 85 | Timelize and approve quality management function operating requirements | | |
| 85 86 | Finalize and approve quality management function IT systems requirements | Wed 5/30/12 | Wed 5/30/12 |

| Health | Health Net DRAFT Demonstration Implementation Work Plan - LA County | | | | | |
|--------|---|--------------|--------------|--|--|--|
| ID | Task Name | Start | Finish | | | |
| 88 | Begin recruiting quality management staff | Fri 6/1/12 | Fri 6/1/12 | | | |
| 89 | Quality monitoring process established | Fri 8/31/12 | Fri 8/31/12 | | | |
| 90 | Finalize and approve quality management operating policies and procedures | Fri 8/31/12 | Fri 8/31/12 | | | |
| 91 | Develop quality management training program and curriculum | Fri 8/31/12 | Fri 8/31/12 | | | |
| 92 | Quality metrics established and validated | Mon 10/1/12 | Mon 10/1/12 | | | |
| 93 | Quality reporting process established | Mon 10/1/12 | Mon 10/1/12 | | | |
| 94 | Deliver quality management staff training | Mon 9/3/12 | Mon 12/31/12 | | | |
| 95 | DEP Care/Case Management function established | Mon 4/2/12 | Mon 12/31/12 | | | |
| 96 | Finalize and approve care/case management operating requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 97 | Finalize and approve care/case management operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 | | | |
| 98 | Finalize and approve care/case management function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 99 | Finalize and approve case/care management function staffing requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 100 | DEP Utilization Management function established | Mon 4/2/12 | Mon 12/31/12 | | | |
| 101 | Finalize and approve utilization management operating requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 102 | Finalize and approve utilization management operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 | | | |
| 103 | Finalize and approve utilization management function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 104 | Finalize and approve utilization management function staffing requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 105 | DEP Disease Management function established | Mon 4/2/12 | Mon 12/31/12 | | | |
| 106 | Finalize and approve disease management operating requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 107 | Finalize and approve disease management operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 | | | |
| 108 | Finalize and approve disease management function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 109 | Finalize and approve disease management function staffing requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 110 | DEP Referral & Authorizations (R&A) function established | Mon 4/2/12 | Mon 12/31/12 | | | |
| 111 | Finalize and approve R&A function operating requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 112 | Finalize and approve R&A function operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 | | | |
| 113 | Finalize and approve R&A function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 114 | Finalize and approve R&A function staffing requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 115 | DEP Pharmacy Benefits Management function established | Mon 4/2/12 | Mon 12/31/12 | | | |
| 116 | Finalize and approve pharmacy benefits management operating requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 117 | Finalize and approve pharmacy benefits management operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 | | | |
| 118 | Finalize and approve pharmacy benefits management function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 119 | Finalize and approve pharmacy benefits management function staffing requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 120 | Develop formularies | Mon 4/2/12 | Mon 12/31/12 | | | |
| 121 | Certify that the Plan will meet all Medicare Part D requirements (e.g., benefits, network adequacy) | Mon 7/30/12 | Fri 9/28/12 | | | |
| 122 | Submit formularies and prescription drug event data | Fri 6/8/12 | Fri 6/8/12 | | | |
| 123 | DEP Behavioral Health (BH) function established | Mon 4/2/12 | Mon 12/31/12 | | | |
| 124 | Finalize and approve BH operating requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 125 | Finalize and approve BH operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 | | | |
| 126 | Finalize and approve BH function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 127 | Finalize and approve BH function staffing requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 128 | DEP Admin Ops functions established | Mon 4/2/12 | Mon 12/31/12 | | | |
| 129 | DEP Enrollment function established | Wed 5/30/12 | Mon 10/15/12 | | | |
| 130 | Finalize and approve enrollment function operating requirements | Wed 5/30/12 | Wed 5/30/12 | | | |
| 131 | Finalize and approve enrollment function IT systems requirements | Wed 5/30/12 | Wed 5/30/12 | | | |
| | | 1100 0/00/12 | | | | |

| Healtl | Health Net DRAFT Demonstration Implementation Work Plan - LA County | | | | | |
|--------|---|--------------|--------------|--|--|--|
| ID | Task Name | Start | Finish | | | |
| 132 | Finalize and approve enrollment function staffing requirements | Thu 5/31/12 | Thu 5/31/12 | | | |
| 133 | Begin recruiting enrollment staff | Fri 6/1/12 | Fri 6/1/12 | | | |
| 134 | Finalize and approve enrollment operating policies and procedures | Thu 8/30/12 | Thu 8/30/12 | | | |
| 135 | Develop enrollment training program and curriculum | Thu 8/30/12 | Thu 8/30/12 | | | |
| 136 | Deliver enrollment staff training | Mon 9/3/12 | Fri 10/12/12 | | | |
| 137 | Benefits loaded and configured in system | Mon 10/1/12 | Mon 10/1/12 | | | |
| 138 | Provider contracts loaded into RMCs | Mon 10/1/12 | Mon 10/1/12 | | | |
| 139 | Enrollment systems and applications go-live | Mon 10/1/12 | Mon 10/1/12 | | | |
| 140 | Begin receiving eligibility files from DHCS and CMS | Mon 10/15/12 | Mon 10/15/12 | | | |
| 141 | Enrollment begins | Mon 10/15/12 | Mon 10/15/12 | | | |
| 142 | ID cards, member communications, eligibility communications, post-enrollment kits mailed (10 days after receipt of eligibility files) | Mon 10/15/12 | Mon 10/15/12 | | | |
| 143 | DEP Claims Processing function established | Mon 4/2/12 | Mon 12/31/12 | | | |
| 144 | Finalize and approve claims processing operating requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 145 | Finalize and approve claims processing operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 | | | |
| 146 | Finalize and approve claims processing function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 147 | Finalize and approve claims processing function staffing requirements | Mon 4/2/12 | Mon 12/31/12 | | | |
| 148 | DEP Member Contact Center function established | Wed 5/30/12 | Mon 10/1/12 | | | |
| 149 | Finalize and approve member contact center operating requirements | Wed 5/30/12 | Wed 5/30/12 | | | |
| 150 | Finalize and approve member contact center function IT systems requirements | Wed 5/30/12 | Wed 5/30/12 | | | |
| 151 | Finalize and approve member contact center function staffing requirements | Thu 5/31/12 | Thu 5/31/12 | | | |
| 152 | Begin recruiting member contact center staff | Fri 6/1/12 | Fri 6/1/12 | | | |
| 153 | Finalize and approve member contact center operating policies and procedures | Mon 7/30/12 | Mon 7/30/12 | | | |
| 154 | Develop member contact center training program and curriculum | Mon 7/30/12 | Mon 7/30/12 | | | |
| 155 | Deliver member contact center staff training | Wed 8/1/12 | Fri 9/14/12 | | | |
| 156 | Establish toll free customer service number | Mon 9/17/12 | Mon 9/17/12 | | | |
| 157 | Member contact center go-live | Mon 9/17/12 | Mon 9/17/12 | | | |
| 158 | • | Mon 10/1/12 | Mon 10/1/12 | | | |
| 159 | Establish quality management component for call monitoring DEP Provider Contact Center function established | | | | | |
| 160 | | Wed 5/30/12 | Mon 7/30/12 | | | |
| | Finalize and approve provider contact center operating requirements | Wed 5/30/12 | Wed 5/30/12 | | | |
| 161 | Finalize and approve provider contact center function IT systems requirements | Wed 5/30/12 | Wed 5/30/12 | | | |
| 162 | Finalize and approve provider contact center function staffing requirements | Thu 5/31/12 | Thu 5/31/12 | | | |
| 163 | Finalize and approve provider contact center operating policies and procedures | Mon 7/30/12 | Mon 7/30/12 | | | |
| 164 | DEP Appeals & Grievances (A&G) function established | Wed 5/30/12 | Mon 12/31/12 | | | |
| 165 | Finalize and approve A&G function operating requirements | Wed 5/30/12 | Wed 5/30/12 | | | |
| 166 | Finalize and approve A&G function IT systems requirements | Wed 5/30/12 | Wed 5/30/12 | | | |
| 167 | Finalize and approve A&G function operating policies and procedures | Mon 7/30/12 | Mon 7/30/12 | | | |
| 168 | A&G process established | Mon 7/30/12 | Mon 7/30/12 | | | |
| 169 | Certify compliance with A&G processes for beneficiaries and providers described in Demonstration Proposal and Federal-State MOU | Mon 7/30/12 | Fri 9/28/12 | | | |
| 170 | Finalize and approve A&G function staffing requirements | Tue 7/31/12 | Tue 7/31/12 | | | |
| 171 | Begin recruiting A&G staff | Wed 8/1/12 | Wed 8/1/12 | | | |
| 172 | Develop A&G training program and curriculum | Fri 9/28/12 | Fri 9/28/12 | | | |
| 173 | Deliver A&G staf training | Mon 10/1/12 | Mon 12/31/12 | | | |
| 174 | DEP Program Integrity (PI) function established | Mon 4/2/12 | Mon 12/31/12 | | | |
| 175 | Finalize and approve PI function operating requirements | Mon 4/2/12 | Mon 12/31/12 | | | |

| Health Net DRAFT Demonstration Implementation Work Plan - LA County | | | | | |
|---|--|-------------|--------------|--|--|
| ID | Task Name | Start | Finish | | |
| 176 | Finalize and approve PI function operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 | | |
| 177 | Finalize and approve PI function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 178 | Finalize and approve PI function staffing requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 179 | DEP Vendor Management function established | Mon 4/2/12 | Mon 12/31/12 | | |
| 180 | Finalize and approve vendor management function operating requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 181 | Finalize and approve vendor management function operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 | | |
| 182 | Finalize and approve vendor management function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 183 | Finalize and approve vendor management function staffing requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 184 | DEP Fraud / Waste / Abuse (FWA) function established | Mon 4/2/12 | Mon 12/31/12 | | |
| 185 | Finalize and approve FWA function operating requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 186 | Finalize and approve FWA function operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 | | |
| 187 | Finalize and approve FWA function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 188 | Finalize and approve FWA function staffing requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 189 | DEP Records Management function established | Mon 4/2/12 | Mon 12/31/12 | | |
| 190 | Finalize and approve records management function operating requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 191 | Finalize and approve records management function operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 | | |
| 192 | Finalize and approve records management function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 193 | Finalize and approve records management function staffing requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 194 | DEP Contract Management function established | Mon 4/2/12 | Mon 12/31/12 | | |
| 195 | Finalize and approve contract management function operating requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 196 | Finalize and approve contract management function operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 | | |
| 197 | Finalize and approve contract management function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 198 | Finalize and approve contract management function staffing requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 199 | DEP Staffing completed | Mon 4/2/12 | Mon 12/31/12 | | |
| 200 | Validate and finalize operational staffing requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 201 | Finalize and approve operational staff roles and responsibilities | Mon 4/2/12 | Mon 12/31/12 | | |
| 202 | Finalize and approve operational staff job descriptions | Mon 4/2/12 | Mon 12/31/12 | | |
| 203 | Finalize and approve operational staff recruiting and hiring plan | Mon 4/2/12 | Mon 12/31/12 | | |
| 204 | Recruit and hire operational staff | Mon 4/2/12 | Mon 12/31/12 | | |
| 205 | DEP Training completed | Mon 4/2/12 | Mon 12/31/12 | | |
| 206 | Finalize and approve operational staff training requirements | Mon 4/2/12 | Mon 12/31/12 | | |
| 207 | Finalize and approve operational staff training materials | Mon 4/2/12 | Mon 12/31/12 | | |
| 208 | Finalize and approve operational staff training plan and schedule | Mon 4/2/12 | Mon 12/31/12 | | |
| 209 | Train operational staff | Mon 4/2/12 | Mon 12/31/12 | | |
| 210 | DEP Monitoring & Evaluation functions established | Tue 5/1/12 | Mon 4/1/13 | | |
| 211 | Performance Monitoring & Reporting function established | Tue 5/1/12 | Mon 4/1/13 | | |
| 212 | Finalize and approve performance monitoring & reporting function operating requirements | Wed 5/30/12 | Wed 5/30/12 | | |
| 213 | Finalize and approve performance monitoring & reporting function IT systems requirements | Wed 5/30/12 | Wed 5/30/12 | | |
| 214 | Finalize and approve performance metrics | Tue 7/31/12 | Tue 7/31/12 | | |
| 215 | Finalize and approve performance monitoring & reporting function staffing requirements | Fri 9/28/12 | Fri 9/28/12 | | |
| 216 | Begin recruiting performance monitoring & reporting staff | Mon 10/1/12 | Mon 10/1/12 | | |
| 217 | Develop performance monitoring & reporting training program and curriculum | Fri 3/1/13 | Fri 3/1/13 | | |
| 218 | Finalize and approve performance monitoring & reporting function operating policies and procedures | Fri 3/1/13 | Fri 3/1/13 | | |
| 219 | Deliver performance monitoring & reporting staff training | Fri 3/29/13 | Fri 3/29/13 | | |

| | Health Net DRAFT Demonstration Implementation Work Plan - LA County | | | | | |
|-----|---|--------------|--------------|--|--|--|
| ID | Task Name | Start | Finish | | | |
| 220 | DEP Information Warehouse (IW) and Reporting established | Tue 5/1/12 | Mon 4/1/13 | | | |
| 221 | Define scope and high level requirements | Tue 5/1/12 | Thu 5/31/12 | | | |
| 222 | Define initial staff requirements | Tue 5/1/12 | Thu 5/31/12 | | | |
| 223 | Identify hardware and software requirements | Fri 6/1/12 | Mon 7/2/12 | | | |
| 224 | Hardware and software procured | Wed 8/1/12 | Wed 8/1/12 | | | |
| 225 | IW developed | Fri 6/1/12 | Mon 4/1/13 | | | |
| 226 | Gather and approve functional area business requirements and source files | Fri 6/1/12 | Thu 8/23/12 | | | |
| 227 | Hardware and software installed | Wed 8/15/12 | Wed 8/15/12 | | | |
| 228 | Develop IW technical design | Fri 8/24/12 | Mon 11/19/12 | | | |
| 229 | Complete IW development | Tue 11/20/12 | Mon 2/11/13 | | | |
| 230 | Conduct unit and user acceptance testing | Tue 2/12/13 | Mon 3/25/13 | | | |
| 231 | IW established | Mon 4/1/13 | Mon 4/1/13 | | | |
| 232 | Performance dashboard developed | Wed 8/15/12 | Mon 4/1/13 | | | |
| 233 | Gather and approve dashboard requirements | Mon 10/1/12 | Mon 11/26/12 | | | |
| 234 | Hardware and software installed | Wed 8/15/12 | Wed 8/15/12 | | | |
| 235 | Develop dashboard technical design | Tue 11/27/12 | Mon 1/21/13 | | | |
| 236 | Create performance dashboard | Tue 1/22/13 | Mon 3/4/13 | | | |
| 237 | Conduct unit and user acceptance testing | Tue 3/5/13 | Mon 3/25/13 | | | |
| 238 | Performance dashboard developed | Mon 4/1/13 | Mon 4/1/13 | | | |
| 239 | Standard reports developed | Wed 8/15/12 | Mon 4/1/13 | | | |
| 240 | Gather and approve standard report requirements | Mon 10/1/12 | Fri 11/16/12 | | | |
| 241 | Hardware and software installed | Wed 8/15/12 | Wed 8/15/12 | | | |
| 242 | Design standard reports | Mon 11/19/12 | Mon 12/31/12 | | | |
| 243 | Develop standard reports | Tue 1/1/13 | Mon 2/11/13 | | | |
| 244 | Conduct unit and user acceptance | Tue 2/12/13 | Mon 3/25/13 | | | |
| 245 | Reporting begins | Mon 4/1/13 | Mon 4/1/13 | | | |
| 246 | DEP Outreach & Communications function established | Mon 4/2/12 | Mon 10/1/12 | | | |
| 247 | DEP Program outreach & communications function established | Mon 4/2/12 | Mon 10/1/12 | | | |
| 248 | Finalize and approve outreach & communications management function staffing requirements | Mon 4/2/12 | Mon 4/2/12 | | | |
| 249 | Finalize and approve outreach & communications management function operating requirements | Thu 5/31/12 | Thu 5/31/12 | | | |
| 250 | Finalize and approve outreach & communications management function IT systems requirements | Fri 6/29/12 | Fri 6/29/12 | | | |
| 251 | Develop outreach and communications plan | Fri 6/29/12 | Fri 6/29/12 | | | |
| 252 | Finalize and approve outreach & communications management function operating policies and procedures | Mon 7/16/12 | Mon 7/16/12 | | | |
| 253 | Develop program outreach and communication materials | Mon 9/10/12 | Mon 9/10/12 | | | |
| 254 | Begin program outreach activities | Mon 10/1/12 | Mon 10/1/12 | | | |
| 255 | DEP Beneficiary communication and education program established | Mon 4/2/12 | Mon 10/1/12 | | | |
| 256 | Finalize and approve beneficiary communication and education program staffing requirements | Mon 4/2/12 | Mon 4/2/12 | | | |
| 257 | Finalize and approve beneficiary communication and education program objectives and goals | Fri 6/29/12 | Fri 6/29/12 | | | |
| 258 | Finalize and approve beneficiary communication and education strategy | Fri 6/29/12 | Fri 6/29/12 | | | |
| 259 | Finalize and approve beneficiary communication and education program responsibilities and assignments | Fri 6/29/12 | Fri 6/29/12 | | | |
| 260 | Develop beneficiary communications and education plan | Fri 6/29/12 | Fri 6/29/12 | | | |
| 261 | Develop beneficiary communication materials | Mon 9/10/12 | Mon 9/10/12 | | | |
| 262 | Begin beneficiary communications | Mon 10/1/12 | Mon 10/1/12 | | | |
| 263 | Certify compliance with rigorous education and outreach requirements established by DHCS | Mon 7/30/12 | Fri 9/28/12 | | | |

| ו סו | Fask Name | Start | Finish |
|------|--|----------------------------|---------------------------|
| 264 | DEP Provider communication and education program established | Mon 4/2/12 | Mon 10/1/12 |
| 265 | Finalize and approve provider communication and education program staffing requirements | Mon 4/2/12 | Mon 4/2/12 |
| 266 | Develop provider communication and education plan and schedule | Fri 6/29/12 | Fri 6/29/12 |
| 267 | Develop provider communications | Mon 9/3/12 | Mon 9/3/12 |
| 268 | Develop provider operations manuals | Mon 9/3/12 | Mon 9/3/12 |
| 269 | Begin provider communications | Mon 10/1/12 | Mon 10/1/12 |
| 270 | DEP Stakeholder engagement program established | Fri 3/30/12 | Fri 9/14/12 |
| 271 | Finalize and approve list of stakeholders | Fri 3/30/12 | Fri 3/30/12 |
| 272 | Finalize and approve stakeholder engagement program objectives and goals | Fri 3/30/12 | Fri 3/30/12 |
| 273 | Finalize stakeholder engagement plan | Mon 4/2/12 | Mon 4/2/12 |
| 274 | Establish External Advisory Group | Mon 4/30/12 | Mon 4/30/12 |
| 275 | Begin stakeholder "town hall" meetings | Fri 9/14/12 | Fri 9/14/12 |
| 276 | DEP Benefits/Product Development function established | Mon 4/2/12 | Fri 9/28/12 |
| 277 | DEP Benefits design and configuration finalized | Mon 4/2/12 | Fri 9/28/12 |
| 278 | Finalize and approve benefit design objectives and goals | Mon 4/2/12 | Fri 6/1/12 |
| 279 | Finalize and approve benefit design framework | Mon 4/2/12 | Fri 6/1/12 |
| 280 | Finalize and approve benefit design framework elements | Mon 4/2/12 | Fri 6/1/12 |
| 281 | Submit proposed plan benefit packages to CMS | Mon 6/4/12 | Mon 6/4/12 |
| 282 | Load benefit configuration in the benefits system | Tue 7/31/12 | Tue 7/31/12 |
| 283 | Validate benefit system accurately configured | Wed 8/1/12 | Fri 9/28/12 |
| 284 | DEP Systems & Technology functions established | Mon 4/2/12 | Mon 12/31/12 |
| 285 | DEP IT infrastructure established | Mon 4/2/12 | Mon 12/31/12 |
| 286 | Finalize and approve IT infrastructure requirements | Mon 4/2/12 | Mon 12/31/12 |
| 287 | Finalize and approve IT infrastructure design | Mon 4/2/12 | Mon 12/31/12 |
| 288 | Build the IT infrastructure | Mon 4/2/12 | Mon 12/31/12 |
| 289 | Test the IT infrastructure | Mon 4/2/12 | Mon 12/31/12 |
| 290 | Implement the IT infrastructure | Mon 4/2/12 | Mon 12/31/12 |
| 291 | Finalize and approve IT infrastructure operations and support requirements | Mon 4/2/12 | Mon 12/31/12 |
| 292 | Finalize and approve IT infrastructure operations and support policies and procedures | Mon 4/2/12 | Mon 12/31/12 |
| 293 | Finalize and approve IT infrastructure operations and support staffing requirements | Mon 4/2/12 | Mon 12/31/12 |
| 294 | DEP Web services function established | Mon 4/2/12 | Mon 12/31/12 |
| 295 | Finalize and approve web services operating requirements | Mon 4/2/12 | Mon 12/31/12 |
| 296 | Finalize and approve web services operating requirements Finalize and approve web services operating policies and procedures | Mon 4/2/12 | Mon 12/31/12 |
| 297 | Finalize and approve web services speciating policies and procedures Finalize and approve web services function IT systems requirements | Mon 4/2/12 | Mon 12/31/12 |
| 298 | Finalize and approve web services function staffing requirements | Mon 4/2/12 | Mon 12/31/12 |
| 299 | ·· | | |
| 300 | DEP Shared Services established Finalize and approve member contact center function IT systems requirements | Wed 5/30/12 Wed 5/30/12 | Mon 7/1/13 Wed 5/30/12 |
| 301 | · · | Mon 7/2/12 | Mon 7/2/12 |
| 302 | Establish Independent living shared services policies Contracts with LA County mental health department executed | Mon 7/2/12 | Mon 7/2/12 |
| 302 | Contracts with IHSS administration executed Contracts with IHSS administration executed | | Mon 7/1/13 |
| 303 | Execute Department of Social Service MOU (Year 1) | Mon 7/2/12 | Mon 7/1/13 |
| 305 | | Mon 7/2/12 | |
| | Execute contract with SEIU | Tue 1/1/13 | Tue 1/1/13 |
| 306 | Execute contract with Public Authority | Mon 7/1/13 | Mon 7/1/13 |
| 307 | Establish medical shared services policies | Tue 7/31/12 | Tue 7/31/12 |

| Health | DRAFT Demonstration Implementation Work Plan - LA County | | | |
|--------|--|--------------|--------------|--|
| ID | Task Name | Start | Finish | |
| 308 | Execute contracts with LTSS providers | Fri 8/31/12 | Fri 8/31/12 | |
| 309 | Establish partnerships with community social support services | Fri 9/28/12 | Fri 9/28/12 | |
| 310 | Operational plan for shared administrative services developed and implemented | Tue 1/1/13 | Tue 1/1/13 | |
| 311 | Finalize and approve shared services staffing requirements | Fri 6/29/12 | Fri 6/29/12 | |
| 312 | Begin recruiting shared services staff | Mon 7/2/12 | Mon 7/2/12 | |
| 313 | Develop shared services training program and curriculum | Thu 11/15/12 | Thu 11/15/12 | |
| 314 | Deliver shared services staff training | Fri 11/16/12 | Mon 12/31/12 | |
| 315 | Consumer Protections established | Mon 7/30/12 | Fri 9/28/12 | |
| 316 | Certify compliance with all consumer protections described in Demonstration Proposal and Federal-State MOU | Mon 7/30/12 | Fri 9/28/12 | |
| 317 | Certify compliance with rigorous standards for accessibility established by DHCS [during readiness review] | Mon 7/30/12 | Fri 9/28/12 | |









Section 6, Attachment 23

Martha J. Smith Dual Eligible Demonstration Project Manager

Experience

January 2007 to Present:

Health Net, Inc. and Health Net Community Solutions

Dual Eligible Demonstration Project Manager

Chief Provider Contracting Officer

- Responsible for the successful implementation and ongoing compliant operations of the Dual Eligible Demonstration Pilot with primary focus on achieving the goals outlined by DHCS and CMS.
- Previously responsible for all provider network activities for Health Net's
 Western Region (California, Oregon, Washington and Arizona). This included
 network development and oversight for all product lines, including Medicare, D SNP, Medi-Cal, SPDs and Commercial programs. Responsible for negotiating
 contracts, compliant operations and managing ongoing relationships and
 provider services with over 60,000 professional providers and over 400
 hospitals and their associated organized delivery models, representing
 approximately \$9 billion in annualized expense.









May 2006 to December 2006:

United HealthCare

Vice President, Network Management

Lead the contracting effort necessary to transition from the leased network to directly contracted network during the initial stages of acquisition of PacifiCare. Responsible for introducing United HealthCare standards and ensuring compliance, while rebuilding strategic relationships in the provider market.

April 1996 to May 2006:

Health Net of California

Vice President, Health Plan Network Management

Held progressive managerial positions in Network Management and Operations in both Southern and Northern California. Responsibilities included strategic development, negotiation, compliant operations and oversight of provider networks for multiple product lines, including Medicare, Medi-Cal, Healthy Families, Commercial, and TRICARE programs. Also had responsibility for development and implementation of the statewide provider network strategy for the Medicare product.

October 1993 to April 1996:

California Pacific Medical Center (CPMC)

Director of Contracting & Manager, Department of Pediatrics

Managed the Department of Pediatrics with P&L and operational responsibilities for hospital and clinic based services, including budgeting, human resources, managed care contracting and marketing functions. Also responsible for tertiary









and transplant services contracting, including risk contracting done jointly with California Pacific Medical Group, the associated IPA.

February 1991 to October 1993:

Kaweah Sierra Medical Group, Inc.

Director of Practice Development and Public Relations

Operational responsibilities included oversight of nursing, transcription, reception, and medical records staff for this 32-physician multi-specialty staff model medical group. In addition, was responsible for public relations and managed care activities. Developed a comprehensive provider (IPA) network, selected and installed a claims system, negotiated and implemented the group's first capitated risk arrangements.

July 1986 to February 1991:

California Preferred Providers, Inc & Freedom Plan, Inc.

Manager of Contracting and Provider Relations

Responsible for development and management of the provider network (hospital, physician and ancillary) for Commercial product lines, including service area expansions in accordance with Knox-Keene regulations. Also managed operations for the medical utilization review subsidiary, Sentinel Medical Review.

Education

 Master of Science, Health Care Administration, University of LaVerne, LaVerne, CA. December 1993.









• Bachelor of Arts, Business Economics, University of California at Santa Barbara, Santa Barbara, CA. June 1985.

Other Professional and Board Affiliations

- Director, Integrated Health Association Board
- Advisory Council Member, First Health