

Managed Care Plan–Correctional Facility MOU Template: Stakeholder Webinar

Objectives for Today's Webinar

1. Provide Overview of Standard DHCS Memorandum of Understanding (MOU) Requirements
2. Review Managed Care Plan (MCP) – Correctional Facility (CF) MOU Template Provisions
3. Discuss Approach to Entering Into MCP-CF MOUs
4. Q&A Regarding the MOU Template and Execution Timeline

Overview of DHCS MOU Requirements

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Goals of DHCS MOUs:

The 2024 Medi-Cal Managed Care Contract (Contract) requires all MCPs to enter into MOUs with counties and third-party entities—including CFs—to contractually ensure the provision of whole-system, person-centered care.

DHCS Goals for Requiring MOUs:

- » Incorporate existing service and program requirements into a single document.
- » Establish minimum requirements around key Contract provisions for MOUs (e.g., training, data-sharing).
- » Clarify roles and responsibilities for coordination of the delivery of care and services of all Members, including across MCP carved out services.
- » Establish formal processes for how MCPs and CFs will collaborate and coordinate on programs.
- » Establish data sharing pathways between MCPs and CFs to support care coordination and enable robust monitoring.
- » Provide mechanisms to ensure overall oversight and accountability for MCPs to execute MOUs with CFs.
- » Provide transparency into roles/responsibilities and relationships between MCPs and CFs.

MOU Requirements and Structure

The MCP-CF MOU Template is part of a broader set of documents and guidance focused on the release and execution of the MOUs. These items include:

APL on MOU Requirements

APL 23-029 explains the Base MOU Template and Bespoke MOU Templates. APL 23-039:

- Explains the intent and purpose of the provisions set forth in the MOUs;
- Sets expectations of MCPs, such as an annual review of the MOU;
- Details requirements related to MOU execution and submission to DHCS; and
- Lays out a monitoring plan for how DHCS will oversee MCP compliance with the MOU requirements.

Base MOU Template

The Base MOU Template contains provisions that must be included in all MOUs. The Base MOU Template:

- Clarifies roles and responsibilities of MCP and CFs;
- Establishes “rules of engagement” to cooperate and address disputes; and
- Includes DHCS recommended optional provisions that parties may consider for execution.

MCP-CF MOU (Today’s Focus)

Specific to MCP and CF’s relationship and programs applicable under the MOU (e.g., Reentry Initiative and CF Partners), the MCP-CF MOU:

- Contains general **and** program-specific required provisions, including incorporating CF requirements based on existing guidance;
- Contains DHCS recommended optional provisions that parties may consider for that particular MOU; and
- Links to specific policies incorporated in the MOU.

General MOU Resources

» DHCS maintains resources to assist MCPs and CFs with MOU implementation.

» [DHCS MOU Webpage](#)

- Houses the DHCS issued APL 23-029, Base MOU Template and Bespoke MOU Templates.
- Houses the MOU FAQs, which provide additional guidance on the APL, Base MOU, and Bespoke MOU Templates; clarifies aspects of MOUs in response to stakeholder feedback; addresses questions on optional provisions, data sharing, enforcement; and more.
- DHCS MOU email address: MCPMOUS@dhcs.ca.gov.

» [DHCS Justice-Involved Initiative Webpage](#)

- The Policy and Operational Guide for Planning and Implementing the Justice-Involved Reentry Initiative is available [here](#).
- DHCS JI email address: CalAIMJusticeAdvisoryGroup@dhcs.ca.gov.



MCP-CF MOU Provisions



Purpose of the MCP-CF MOU Template

- » The MCP-CF MOU outlines service provision, care coordination, referral, oversight, and other requirements based upon the *Policy and Operational Guide for Planning and Implementing the Justice-Involved Reentry Initiative* and provisions in the 2024 MCP Contract.
- » Through negotiating the MOU, MCPs and CFs will:
 - Open or improve channels of communication between MCPs and CFs;
 - Enhance each party's understanding of the other's respective services, referral processes, and operations; and
 - Clearly delineate roles and responsibilities to support the implementation of the Reentry Initiative, including plans for ongoing communication and collaboration.

Base MOU Template Requirements

Every MOU template contains the following provisions as required under the Contract:

- » **Definitions**
- » **Services Covered by This MOU**
- » **Party Obligations**
- » **Training and Education**
- » **Referrals**
- » **Care Coordination**
- » **Quarterly Meetings**
- » **Quality Improvement**
- » **Data Sharing and Confidentiality**
- » **Dispute Resolution**
- » **Equal Treatment**
- » **General**

MCP-CF MOU Template (1/3)

The MCP-CF MOU template contains the following provisions specific to the MCP-CF relationship and their roles in the implementation of the Reentry Initiative:

- » **Definitions.** Definitions for “MCP Responsible Person,” “JI Liaison,” “CF Responsible Person,” “CF Liaison,” “Behavioral Health Link,” “Pre-Release Care Manager,” “Care Manager Warm Handoff,” “Post-Release JI ECM Provider,” “Qualified Individual,” and “Reentry Care Plan.”
- » **MCP Obligations:** Requirements for the MCP Responsible Person to meet at least quarterly with the CF, ensure training and education on Reentry Initiative policy, and establish a JI Liaison point of contact.
- » **CF Obligations:** Requirements for the CF to authorize and ensure delivery of pre-release care management services and staff a CF Liaison.
- » **Training and Education Requirements.** Requirement that MCP provide CFs with training and/or educational materials on how MCP services may be accessed.

1. Definitions align with the Policy and Operational Guide for Planning and Implementing the Justice-Involved Reentry Initiative.

MCP-CF MOU Template (2/3)

- » **Referrals Requirements.** Requires the parties to work collaboratively to develop policies and procedures for referrals, including:
- If the CF provides pre-release care management delivered by Embedded Pre-Release Care Managers, ensure development of a Health Risk Assessment and Goals and Objectives Document and Reentry Care Plan.
 - The MCP and CF must share all information needed to support authorization of services and supports for the Member upon release.
 - The CF must ensure identification of post-release Covered Services or supports and must ensure processes for the Pre-Release Care Manager to complete referrals to the MCP through the JI Liaison or another identified pathway.
 - The MCP must implement Closed-Loop Referral¹ requirements for all referrals made to ECM and Community Supports and ensure that, after release from incarceration, Members receive all Covered Services for which they are referred prior to release.

1. DHCS, "Closed-Loop Referral Implementation Guidance," December 2024. Available at: <https://www.dhcs.ca.gov/CalAIM/Documents/WIP-CLR-Implementation-Guidance.pdf>.

MCP-CF MOU Template (3/3)

- » **Care Coordination and Collaboration Requirements:** Requires the parties to work collaboratively to develop policies and procedures that ensure coordination of access to care and services, including:
 - **Care Manager Assignments.** Requires the parties to collaborate and share information to ensure that each Member is assigned a Pre-Release Care Manager and Post-Release ECM Provider.
 - **Reentry Planning and Coordination.**
 - MCPs must share information about the Member's care and treating providers prior to incarceration upon request and respond to requests for service authorization and identification of in-network providers in a timely fashion.
 - MCPs and CFs must coordinate to ensure Member access to post-release non-specialty behavioral health care (as appropriate), participation in Behavioral Health Links, and information-sharing.
 - MCP and CF must coordinate to ensure a warm handoff, as appropriate.
 - MCPs and CFs must coordinate care at reentry, including notification of a Member's release, sharing the Reentry Care Plan, and ensuring access to post-release services and follow-up by ECM providers.

Optional Requirements: MCP-CF MOU Template

In addition to required provisions in the MCP-CF MOU template, MCPs and CFs may implement additional, optional provisions specific to their collaboration processes. The MCP-CF MOU Template contains suggested optional provisions, including:

- » Indicating mode of communication (e.g., telephone, email, fax) and required timeframe of response to referrals or other related communications.
- » County-specific Pre-Release Care Manager and Post-Release JI ECM Provider assignment process.
- » County-specific processes for identification of eligible Providers who may serve as the In-Reach Pre-Release Care Manager and/or Post-Release ECM Provider to serve Members who are not yet assigned to an MCP.
- » County-specific processes for identification of an approved out-of-network behavioral health provider if there is no available in-network Provider to see the Member within the recommended Behavioral Health Link follow up timeframe.

Approach to Executing MCP-CF MOUs

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Approach for MCPs and CFs to Execute MOUs

DHCS will require MOUs between MCPs and CFs in their counties or regions of operation, including state prisons.

- » **County Jails and County Youth Correctional Facilities (YCF)** must enter into MOUs at a county level (e.g., County Sheriff signs on behalf of all jails in the county; County Probation signs on behalf of all YCFs in the county).
 - County Jails and County YCFs may either:
 - Enter into a unique MOU with each MCP in their county; or,
 - Enter into one MOU with all MCPs in their county.
- » **State Prisons (CDCR/CCHCS)** plans to negotiate one MOU on behalf of all state prisons with all MCPs.

2025-2026 MOU Execution Timeline

- » For CFs that go live with pre-release services **prior to or on January 1, 2026**, the CF and MCP must enter into an MOU **by January 1, 2026**.
 - If the CF and MCP do not meet this deadline, the MCP and CF must both submit quarterly reports on progress to DHCS.
- » For CFs that go live with pre-release services **after January 1, 2026**, the CF and MCP must enter into an MOU **by the CF's go-live date**.
 - If the CF and MCP do not meet this deadline, the MCP and CF must both submit quarterly reports on progress to DHCS.

DHCS will require the submission of copies of the MOU for DHCS review and approval, in alignment with [APL 23-029](#), and will monitor MOUs on an ongoing basis.

Note: If a MCP and CF already have a MOU in place, the CF and MCP must update the MOU to ensure it meets mandatory provisions in the MCP-CF MOU Template developed by DHCS.



Best Practice: DHCS recommends that CFs and MCPs begin negotiating the MOU upon submission of the Readiness Assessment.

Next Steps



Next Steps

» **Stakeholder Comment Period:**

- Stakeholder review of the JI MCP-CF MOU Template will take place from Thursday, July 31, 2025, to Friday, August 22, 2025.
- **Please submit any feedback on the MCP-CF MOU using the provided Feedback Matrix by Friday, August 22, 2025. Feedback should be sent to calaimjusticeadvisorygroup@dhcs.ca.gov.**

» **Finalization of the MCP-CF MOU Template:**

- DHCS will review feedback and make any necessary modifications to the MOU template prior to the release of a final MCP-CF MOU template.
- DHCS will hold an additional webinar after final MCP-CF MOU is released to review modifications.

Questions?



Base MOU Template Requirements (1/3)

Every MOU template contains the following provisions as required under the Contract:

- » **Definitions.** Sets forth the defined terms used in the MOU such as the "MCP-Agency Liaison." Provides definitions for capitalized terms not otherwise defined in the MCP's Medi-Cal Managed Care Contract.
- » **Services Covered by This MOU.** Describes the services that the MCP and the CF must coordinate for Members.
- » **Party Obligations.** Describes each party's provision of services and oversight responsibilities (e.g., each party must designate a point of contact to act as the liaison for coordinating with the other party).
- » **Training and Education.** Requires MCP to provide education to members and Network Providers about covered services and CF's services available. Requires MCP to train employees who carry out responsibilities under the MOU and, as applicable, Network Providers, Subcontractors and Downstream Subcontractors on the MOU requirements and CF's obligations to provide care.

Base MOU Template Requirements (2/3)

- » **Referrals.** Requires the parties to refer to each other as appropriate and describes each party's referral pathways.
- » **Care Coordination.** Describes the policies and procedures for coordinating care between the parties, addressing barriers to care coordination, and ensuring ongoing monitoring and improvement of care coordination.
- » **Quarterly Meetings.** Requires the parties to meet at least quarterly to address care coordination, Quality Improvement (QI) activities, QI outcomes, and systemic and case-specific concerns, and to communicate with others within their organizations about such activities.
- » **Quality Improvement (QI).** Requires the parties to develop QI activities specifically for oversight of the MOU requirements, including any applicable performance measures and QI initiatives, such as those to prevent duplication of services, as well as reports that track referrals, Member engagement, and service utilization. MCP must document these QI activities in its policies and procedures.

Base MOU Template Requirements (3/3)

- » **Data Sharing and Confidentiality.** Requires the parties to have policies and procedures for sharing the minimum data and information necessary to ensure the MOU requirements are met and describes the data and information the CF may share with MCP to improve care coordination and referral processes. Requires the parties to implement policies and procedures for how the minimum necessary information and data (determined by the parties) will be shared in accordance with applicable law.
- » **Dispute Resolution.** Describes the policies and procedures for resolving disputes between the parties and the process for bringing the disputes to DHCS when the parties are unable to resolve disputes.
- » **Equal Treatment.** Provides that nothing in this MOU is intended to benefit or prioritize Members over persons who are not Members also receiving services from the CF.
- » **General.** Sets forth additional general contract requirements, such as the requirements that the MCP must publicly post the executed MOU, the MCP must annually review the MOU, and the MOU cannot be delegated.