



December 29, 2023

THIS LETTER SENT VIA EMAIL

Les Ybarra, Chief Executive Officer
Anthem Blue Cross Partnership Plan
21215 Burbank Blvd.
Woodland Hills, CA 91367

**NOTICE OF IMPOSITION OF MONETARY SANCTIONS FOR FAILURE TO MEET
MINIMUM PERFORMANCE LEVELS FOR MEDI-CAL MANAGED CARE
ACCOUNTABILITY SET PERFORMANCE MEASURES**

Dear Les Ybarra,

The Department of Health Care Services (DHCS) sends this notice of imposition of monetary sanctions on Anthem Blue Cross Partnership Plan for failure to meet required minimum performance levels (MPLs) for measurement year (MY) 2022 Medi-Cal Managed Care Accountability Set (MCAS) performance measures.

Under the contract with DHCS, Anthem Blue Cross Partnership Plan is required to meet the DHCS established MPLs for each Health Effectiveness Data and Information Set (HEDIS) measure and all other required MCAS performance measures (Exhibit A, Attachment 4, Quality Improvement System, section 9 External Quality Review Requirements, A).

Successful administration of the Medi-Cal program requires a collaborative partnership between DHCS and Medi-Cal managed care plans (MCPs). This collaboration includes the expectation that MCPs will meet their contractual and programmatic requirements on an ongoing basis. Anthem Blue Cross Partnership Plan and DHCS regularly collaborated on strategies for improving the Plan's MCAS performance measures required to meet MPLs. On July 20, 2023, DHCS received validated MCAS measure rates from the External Quality Review Organization and confirmed that Anthem Blue Cross Partnership Plan has 84 plan-wide measures below MPL across 4 domains for MY 2022. See Table 2 for enforcement tier designation triggers.

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Under Welfare and Institutions Code (W&I) section 14197.7 and the MCP contract, DHCS has the authority to impose monetary sanctions for Anthem Blue Cross Partnership Plan's failure to meet its MPLs for all applicable MCAS performance measures (Exhibit E, Attachment 2, Program Terms and Conditions, section 17 Sanctions, B; W&I § 14197.7(f)(1)). As noted above, the MCP contract requires it to meet the DHCS established MPLs for each MCAS performance measure (Exhibit A, Attachment 4, Quality Improvement System, section 9 External Quality Review Requirements, A). Anthem Blue Cross Partnership Plan confirming failure to meet the MPLs as outlined in the contract creates good cause for DHCS to impose monetary sanctions (Exhibit E, Attachment 2, Program Terms and Conditions, section 17 Sanctions, B; W&I § 14197.7(f)(1)).

DHCS is imposing monetary sanctions for Anthem Blue Cross Partnership Plan's failure to comply with its obligations set forth in the contract. Under W&I section 14197.7(f), DHCS is authorized to impose a \$25,000 sanction per violation of Anthem Blue Cross Partnership Plan's contractual obligation to meet MPLs for each MCAS performance measure.

The total sanction amount for Anthem Blue Cross Partnership Plan is \$323,000 for the following 84 measures below the MPL for MY 2022:

Reporting Unit	Measures*	Domains*	MCP Rates	MPL	Trending Difference from HEDIS MY 2021	Population Impacted
Alameda	FUM-30Day	BH	42.99%	54.51%	29.3	317
	LSC	CH	52.80%	63.99%	0	362
	WCV	CH	44.07%	48.93%	-1.29	11725
	CBP	CD	50.36%	59.85%	-5.84	1381
	BCS	RC	42.37%	50.95%	2.69	1673
	CCS	RC	48.42%	57.64%	-0.85	7658
Contra Costa	FUM-30Day	BH	46.60%	54.51%	22.36	55
	IMA-2	CH	34.31%	35.04%	3.9	422
	LSC	CH	39.17%	63.99%	0	265
	W30-2	CH	63.68%	65.83%	7.39	158
	W30-6	CH	54.48%	55.72%	14.48	61
	WCV	CH	44.65%	48.93%	-2.41	6931
	CBP	CD	58.15%	59.85%	5.35	440
	BCS	RC	42.96%	50.95%	1.36	648
CCS	RC	51.82%	57.64%	2.18	2966	

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Fresno	FUA-30Day	BH	20.29%	21.24%	17.2	613
	FUM-30Day	BH	26.87%	54.51%	12.33	509
	CIS-10	CH	31.39%	34.79%	-2.67	1621
	LSC	CH	51.82%	63.99%	0	1138
	W30-2	CH	61.31%	65.83%	4.29	893
	W30-6	CH	45.03%	55.72%	9.75	724
	WCV	CH	45.64%	48.93%	2.71	25682
	CBP	CD	58.64%	59.85%	2.44	3044
	BCS	RC	47.13%	50.95%	-0.2	2816
	CCS	RC	54.99%	57.64%	-0.73	12730
	PPC-Post	RC	76.89%	77.37%	1.22	450
Kings	CIS-10	CH	24.33%	34.79%	-5.07	327
	IMA-2	CH	30.92%	35.04%	0.26	324
	LSC	CH	49.64%	63.99%	0	218
	W30-2	CH	55.97%	65.83%	8.47	177
	W30-6	CH	54.39%	55.72%	5.19	104
	WCV	CH	39.35%	48.93%	0.7	5259
Madera	FUM-30Day	BH	46.23%	54.51%	27.04	57
	LSC	CH	62.77%	63.99%	0	179
	W30-6	CH	46.00%	55.72%	-3.55	135
	CBP	CD	58.64%	59.85%	-1.46	452
	HBD-H9	CD	48.91%	39.90%	-7.97	502
Region 1	CIS-10	CH	29.93%	34.79%	-4.13	680
	IMA-2	CH	29.68%	35.04%	1.75	951
	LSC	CH	53.04%	63.99%	0	456
	W30-6	CH	49.10%	55.72%	0.19	197
	WCV	CH	45.49%	48.93%	0.86	13330
	BCS	RC	43.35%	50.95%	2.34	1737
	CCS	RC	49.39%	57.64%	2.43	7277
	CHL-Tot	RC	49.66%	55.32%	3.19	1111
Region 2	CIS-10	CH	23.60%	34.79%	-5.6	1225
	IMA-2	CH	28.47%	35.04%	-0.48	1346
	LSC	CH	45.01%	63.99%	0	882
	W30-2	CH	61.92%	65.83%	1.15	620
	W30-6	CH	49.68%	55.72%	1.71	316
	WCV	CH	39.79%	48.93%	-0.31	21595
	BCS	RC	45.04%	50.95%	0.72	2670
	CCS	RC	55.47%	57.64%	-0.64	10736
	CHL-Tot	RC	47.31%	55.32%	-0.43	1598
	PPC-Pre	RC	84.43%	85.40%	-2.61	173

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Sacramento	FUM-30Day	BH	53.99%	54.51%	24.66	629
	CIS-10	CH	25.79%	34.79%	-6.81	2480
	LSC	CH	45.87%	63.99%	0	1809
	W30-2	CH	62.79%	65.83%	1.61	1309
	W30-6	CH	50.33%	55.72%	14.83	905
	CBP	CD	51.58%	59.85%	0.97	4630
	BCS	RC	44.26%	50.95%	-2.73	5400
	CCS	RC	57.11%	57.64%	-1.04	19953
San Benito	FUM-30Day	BH	22.81%	54.51%	5.16	44
	CIS-10	CH	28.02%	34.79%	-7.13	167
	WCV	CH	48.35%	48.93%	0.55	2063
San Francisco	FUM-30Day	BH	44.88%	54.51%	14.47	113
	W30-2	CH	58.90%	65.83%	-2.11	60
	W30-6	CH	49.32%	55.72%	5.27	37
	WCV	CH	41.67%	48.93%	-2.55	2300
	CBP	CD	54.99%	59.85%	2.19	436
	HBD-H9	CD	42.82%	39.90%	-6.08	445
	BCS	RC	50.18%	50.95%	4.98	560
	CCS	RC	46.47%	57.64%	-3.29	2589
Santa Clara	FUM-30Day	BH	52.70%	54.51%	25.67	149
	LSC	CH	61.80%	63.99%	0	326
	W30-6	CH	45.68%	55.72%	2.26	283
	WCV	CH	42.87%	48.93%	-2.17	12632
	CBP	CD	50.61%	59.85%	-0.24	1651
	BCS	RC	46.97%	50.95%	0.84	2040
	CCS	RC	50.36%	57.64%	-1.46	7024
Tulare	CIS-10	CH	33.09%	34.79%	-0.97	1463
	LSC	CH	58.15%	63.99%	0	915
	WCV	CH	45.23%	48.93%	0.38	25929

*Please see Table 1 for acronym definitions

Pursuant to W&I section 14197.7 and in accordance with the December 4, 2023, Quality Sanction Bulletin, DHCS has considered the factors set forth in W&I section 14197.7(f) and (g) in determining the sanction amount, including the following:

- Scope of the violations, which are determined by the number of eligible members impacted by the quality-of-care violation (i.e., the number of eligible members who did not receive the recommended preventive service.) If an MCP's failure to meet an MPL impacts more than 25,000 eligible members, then each impacted beneficiary will constitute a

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separate violation and the MCP may be sanctioned more than \$25,000 total, as provided by W&I sections 14197.7(f)(1) and (g)(1).

- In determining the nature, scope, and gravity of the violation under W&I section 14197.7(g)(1), DHCS will consider the degree to which the MCP is below the MPL for the measure at issue and will increase sanction amounts per violation based upon the severity of the violation. (Please see Table 3 for violation factors).
- DHCS will consider whether the MCP's performance on the MPL at issue has improved or worsened over the previous MY under W&I section 14197.7(g)(6). If performance has gotten worse over the previous MY, the sanction amount will increase; if performance has improved, the sanction amount will decrease. (Please see Table 4 for trending factors).
- DHCS has reduced the total sanction amount for MCPs in counties with Healthy Places Index (HPI) scores under the 50th percentile, as determined by DHCS (Please see Table 5 for HPI percentile and impact factors). **This amount has already been accounted for in the sanction total above.**

MCP by County	HPI Percentile	HPI Impact Factor
Anthem Blue Cross/Alameda	91.20%	0.0%
Anthem Blue Cross/Contra Costa	87.70%	0.0%
Anthem Blue Cross/Fresno	8.7%	50.0%
Anthem Blue Cross/Kings	14.0%	40.0%
Anthem Blue Cross/Madera	21.0%	30.0%
Anthem Blue Cross/Region 1	40.3%	10.0%
Anthem Blue Cross/Region 2	75.4%	0.0%
Anthem Blue Cross/Sacramento	50.8%	0.0%
Anthem Blue Cross/San Benito	73.6%	0.0%
Anthem Blue Cross/San Francisco	98.20%	0.0%
Anthem Blue Cross/Santa Clara	92.90%	0.0%
Anthem Blue Cross/Tulare	7.0%	50.0%

Anthem Blue Cross Partnership Plan is also required to submit a revised comprehensive quality strategy on or before January 31, 2024, that includes new interventions designed to meet or exceed the required 2024 milestones and details how it intends to devote adequate resources and staff to quality improvement.

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Sincerely,

DocuSigned by:
Sarah Lahidji
CF9B74026BA741A...

Sarah Lahidji

Division Chief, Quality and Health Equity

Quality and Population Health Management

Department of Health Care Services

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Enclosure

TABLE 1: DOMAIN, MEASURE, & ACRONYM		
Domain	Measure	Acronym
Children's Health (CH)	Child and Adolescent Well-Care Visits	WCV
	Childhood Immunization Status: Combination 10	CIS-10
	Immunizations for Adolescents: Combination 2	IMA-2
	Lead Screening in Children	LSC
	Well-Child Visits in the First 30 Months of Life – Well-Child Visits in the First 15 Months – Six or More Visits	W30-6
	Well-Child Visits in the First 30 Months of Life – Well-Child Visits for Age 15 Months to 30 Months – Two or More Visits	W30-2
Reproductive Health and Cancer Prevention (RC)	Breast Cancer Screening	BCS
	Cervical Cancer Screening	CCS
	Chlamydia Screening in Women	CHL
	Prenatal and Postpartum Care: Postpartum Care	PPC-Post
	Prenatal and Postpartum Care: Timeliness of Prenatal Care	PPC-Pre
Chronic Disease Management (CD)	Comprehensive Diabetes Care: HbA1c Poor Control (>9.0%)*	HBD-H9*
	Controlling High Blood Pressure	CBP
Behavioral Health (BH)	Follow-up After Emergency Department Visit for Mental Illness – 30-day Follow-Up	FUM-30Day
	Follow-up After Emergency Department Visit for Substance Use – 30-day Follow-Up	FUA-30Day

*A lower rate is better for this measure

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TABLE 2: QUALITY ENFORCEMENT TIER DESIGNATION TRIGGERS			
Enforcement Tiers	Tier 1	Tier 2	Tier 3
Triggers	One (1) measure below the MPL in any one (1) domain	Two (2) or more measures below the MPL in any one (1) domain	Three (3) or more measures below the MPL in two (2) or more domains
Enforcement Action	Not subject to monetary sanction	Subject to monetary sanction	Subject to monetary sanction

TABLE 3: VIOLATION AND BENEFICIARY IMPACT (W&I section 14197.7(g)(1))		
Severity/Beneficiary Impact	Violation per Measure	Severity Violation Factor
Minimal Violation	<1.00% below MPL	1.0
Minor violation	1.00% - 5.99% below MPL	1.2
Moderate Violation	6.00% - 10.99% below MPL	1.4
Moderately severe violation	11.00% - 15.99% below MPL	1.6
Severe Violation	16.00% - 20.99% below MPL	1.8
Extremely severe violation	≥21.00% below the MPL	2.0

TABLE 4: TRENDING FACTOR (W&I section 14197.7(g)(6))		
Degrees of Improvement	Trending Difference per Measure	Trending Factor
Significant Worsening	≤(-)15.01%	2.0
Moderately Significant Worsening	(-)15.00% - (-)11.01%	1.8
Moderate Worsening	(-)11.00% - (-)7.01%	1.6
Minimal Worsening	(-)7.00% - (-)4.01%	1.4
Slight worsening	(-)4.00% - (-)0.01%	1.2
No Improvement	0.00 - 1.00%	1.0
Slight Improvement	1.01% - 4.00%	0.8
Minimal Improvement	4.01% - 7.00%	0.6
Moderate Improvement	7.01% - 11.00%	0.4
Moderately Significant Improvement	11.01% - 15.00%	0.2
Significant Improvement	≥15.01%	0.0

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TABLE 5: HPI IMPACT AND SANCTION REDUCTION		
Severity (Impact) of HPI (per county and MCP)	HPI Percentile	HPI Impact Factor (Sanction Reduction)
Very High	0-9%ile	50%
High	10-19%ile	40%
Moderate	20-29%ile	30%
Low Moderate	30-39%ile	20%
Low	40-49%ile	10%

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NOTICE OF APPEAL RIGHTS

Anthem Blue Cross Partnership Plan has the right to request a hearing in connection with any sanctions within 15 business days after receipt of the notice to impose sanctions. DHCS will stay the imposition of sanctions upon receipt of the request for a hearing until the effective date of a final decision from the Office of Administrative Hearings and Appeals. Anthem Blue Cross Partnership Plan may request a hearing by sending a letter so stating to the Office of Administrative Hearings and Appeals at the address below:

Chief Administrative Law Judge
Office of Administrative Hearings and Appeals
Department of Health Care Services
3831 N. Freeway Blvd., Suite 200
Sacramento, CA 95834

A copy of the hearing request shall also be sent to:

Thomas Mahoney
Quality and Health Equity Measurement Monitoring Section Chief
Quality and Population Health Management
Department of Health Care Services
MS 0020
P.O. Box 997413
Sacramento CA 95899-7413

Judith Recchio
Deputy Director and Chief Counsel
Office of Legal Services
Department of Health Care Services
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