



State of California—Health and Human Services Agency
Department of Health Care Services



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DATE: April 30, 2020

SUPPLEMENT TO ALL PLAN LETTER 19-017

TO: ALL MEDI-CAL MANAGED CARE HEALTH PLANS

SUBJECT: QUALITY AND PERFORMANCE IMPROVEMENT ADJUSTMENTS DUE TO COVID-19

PURPOSE:

The purpose of this supplement to All Plan Letter (APL) 19-017 is to provide Medi-Cal managed care health plans (MCPs) with adjustments to quality and performance improvement requirements as a result of the current public health emergency resulting from COVID-19. These adjustments are consistent with recent allowances from the National Committee for Quality Assurance (NCQA).

BACKGROUND:

On March 13, 2020, NCQA released guidance on reporting year (RY) 2020 Healthcare Effectiveness Data Information Set (HEDIS) reporting. This included an adjustment for RY 2020 reporting on measures utilizing the hybrid methodology given the limitations on medical record collection imposed by COVID-19 due to travel restrictions, quarantines, and risk to staff.

For commercial and Medicaid health plans reporting to NCQA, for measures reported utilizing the hybrid methodology only, NCQA will allow health plans to report their audited HEDIS 2019 hybrid rate if, as a result of low chart retrieval, that rate is better than their HEDIS 2020 hybrid rate. NCQA has not allowed any exceptions for reporting administrative rates, which should be reported following HEDIS 2020 reporting requirements.¹

The Department of Health Care Services (DHCS) is committed to ensuring that MCPs and providers are able to focus on caring for members during this public health emergency, and to not putting individuals at risk by requiring travel or collection of data in offices that may be overwhelmed by patients needing care. Because MCPs will not be able to report hybrid measures as they normally would, hybrids rates for RY 2020 may not accurately reflect the true provision of services; therefore, DHCS is waiving the

¹ More information on NCQA's policies related to COVID-19 is available at the following link: https://www.ncqa.org/covid/?utm_medium=email&utm_source=sf&utm_campaign=covid-digest&utm_term=20200326

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requirement to meet the minimum performance level (MPL) for hybrid measures for RY 2020.

POLICY:

In light of the public safety issues in continuing to require the collection of medical record data for measurement year (MY) 2019 and to align with direction from NCQA, DHCS is making the following adjustments to quality and performance improvement requirements for RY 2020/MY 2019:

For RY 2020/MY 2019 Managed Care Accountability Set (MCAS) measures:

- MCPs will report on administrative measures as they normally would, as directed by DHCS and its External Quality Review Organization.
- MCPs have three options for reporting hybrid measures that were also reported in RY 2019/MY 2018; MCPs may choose whichever option they find most appropriate for their MCP:
 - Report per applicable NCQA or CMS hybrid technical specifications using MY 2019 data;
 - Report MY 2018 audited hybrid rates (as per the NCQA adjustment outlined above); or
 - Report with administrative data only using MY 2019 data.
- MCPs have two options for reporting hybrid measures that were not reported in RY 2019/MY 2018 (e.g., hybrid measures that are new to the MCAS for RY 2020); MCPs may choose whichever option they find most appropriate for their MCP:
 - Report per applicable NCQA or CMS hybrid technical specifications using MY 2019 data; or
 - Report with administrative data only using MY 2019 data.

For RY 2020/MY 2019, MCPs will not be held to the MPLs, or be subject to sanctions or corrective action plans for any MCAS measures designated for reporting by the hybrid methodology. MCPs must continue to submit encounter data as required by Title 22, California Code of Regulations (CCR) section 53862 and as required in MCP contracts and all applicable APLs.²

MCPs are responsible for ensuring that their subcontractors and network providers comply with the requirements in this supplemental guidance as well as all applicable state and federal laws and regulations, contract requirements, and other DHCS guidance, including APLs and Policy Letters. These requirements must be communicated by each MCP to all subcontractors and network providers.

² The CCR is searchable at the following link: <https://govt.westlaw.com/calregs/Search/Index>

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If you have any questions regarding this APL supplement, please contact your Managed Care Operations Division Contract Manager.

Sincerely,

Original Signed by Nathan Nau

Nathan Nau, Chief
Managed Care Quality and Monitoring Division