

DATE: September 17, 2024

ALL PLAN LETTER 24-012

TO: ALL MEDI-CAL MANAGED CARE PLANS

SUBJECT: NON-SPECIALTY MENTAL HEALTH SERVICES: MEMBER OUTREACH, EDUCATION, AND EXPERIENCE REQUIREMENTS

PURPOSE:

The purpose of this All Plan Letter (APL) is to provide guidance to Medi-Cal managed care plans (MCPs) regarding requirements for Member outreach, education, and assessing Member experience for Non-Specialty Mental Health Services (NSMHS), as required by Senate Bill (SB) 1019 (Gonzalez, Chapter 879, Statutes of 2022).¹

BACKGROUND:

Many Medi-Cal members experience mental health symptoms that are undertreated each year. Since the COVID-19 Public Health Emergency, these findings have been exacerbated with low utilization rates of NSMHS. SB 1019 aims to address these gaps in services by requiring MCPs to develop plans and conduct annual outreach and education to Members and Primary Care Providers (PCPs) regarding covered NSMHS. SB 1019 requirements align with the Department of Health Care Services' (DHCS) California Advancing and Innovating Medi-Cal (CalAIM) initiative's No Wrong Door Policy by enhancing Member understanding of access to covered NSMHS.² The bill requires an assessment of Members' experiences using NSMHS through survey tools and methodologies and assessing if MCPs' engagement plans are positively impacting Members' access to NSMHS. SB 1019 highlights the importance of outreach and education regarding covered NSMHS to help Members and PCPs better understand how to access these services. SB 1019 outlines requirements for MCPs to develop and implement a plan for annual Member and PCP outreach and education regarding NSMHS covered by the MCP that is submitted to DHCS and has begun implementation no later than January 1, 2025.

¹ See the full text of SB 1019 at:

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB1019. Bills and State law are searchable at: <https://leginfo.legislature.ca.gov/>

² See APL 22-005, or any superseding APL, which can be found at:

<https://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2022/APL22-005.pdf>; APLs are searchable at: <https://www.dhcs.ca.gov/formsandpubs/Pages/AllPlanLetters.aspx>

POLICY:

MCPs must develop and implement an annual outreach and education plan for Members and PCPs regarding covered NSMHS.³ The outreach and education conducted for Members must meet cultural and linguistic appropriateness standards, incorporate best practices in stigma reduction, and provide multiple points of contact for Members to access NSMHS.

Outreach & Education Plan Requirements

Member Outreach & Education Plan

MCPs must develop an outreach and education plan for their Members regarding covered NSMHS that is informed by, but not limited, to the following:

- 1) The MCP's stakeholders, including the community advisory committee (CAC) established by the MCP and Quality Improvement and Health Equity Committee (QIHEC). MCPs must attest to convening with their CACs to develop their outreach and education plans, and MCP attestations must be included with the outreach and education plans submitted to DHCS.
- 2) Most recently approved DHCS Population Needs Assessment as defined by the Population Health Management (PHM) Policy Guide⁴, or the most recently approved National Committee for Quality Assurance (NCQA) Health Plan Accreditation (HPA) Population Assessment.⁵
- 3) A utilization assessment of provided NSMHS that is, at a minimum, stratified and analyzed by race, ethnicity, language, age, sexual orientation, gender identity, and disability.

The outreach and education plan developed using the elements above must include information about the mental health benefits that are covered by the MCP. Please see the 2024 Managed Care Contract⁶ and APL 18-016, or any superseding APL, for additional guidance and requirements regarding outreach, education, and Member information.

MCPs should reach out to their County Mental Health Plan (MHP) partners in the development of their outreach and education plans to coordinate efforts to educate

³ Welfare and Institutions Code section 14190.1.

⁴ The PHM Policy Guide can be found at: <https://www.dhcs.ca.gov/CalAIM/Documents/PHM-Policy-Guide.pdf>

⁵ After January 1, 2026, MCPs are contractually required to have full NCQA HPA and must use the NCQA HPA Population Assessment to develop and/or update their outreach and education plan.

⁶ The Medi-Cal Managed Care Boilerplate Contract can be found at: <https://www.dhcs.ca.gov/provgovpart/Pages/MMCDBoilerplateContracts.aspx>

Members on how to access mental and behavioral health services. This is an opportunity for MCPs and MHPs to help Members better understand their options and enhance continuity of care.

MCPs should also coordinate with their tribal liaisons in the development of their outreach and education plans to ensure their plans incorporate tribal partner input and address continuity of care for American Indian MCP Members. MCPs should reference APL 24-002, or any superseding APL, for further guidance on tribal liaison roles and responsibilities, as well as relevant trainings on (1) cultural humility⁷ and (2) trauma-informed care and historical trauma.⁸

MCPs should consider partnering with the following groups to provide outreach to Members: community-based organizations, navigators, community health workers, promotores/promotoras, and other providers trained to conduct outreach and education.

MCPs should reference DHCS' CalAIM initiative's No Wrong Door Policy as it applies to NSMHS in their outreach and education plans, to ensure Members understand how they can "receive timely mental health services without delay regardless of the delivery system where they seek care and that members are able to maintain treatment relationships with trusted providers without interruption."⁹

PCP Outreach & Education Plan

MCPs must also conduct annual outreach and education to PCPs regarding the covered NSMHS. The PCP outreach and education plan must be informed by the QIHEC.

MCPs must update their outreach and education plans in subsequent years, as needed, based on learnings from the Diversity, Equity, and Inclusion training programs, as outlined in APL 23-025, or any superseding APL.

⁷ The Governor's Office of Tribal Affairs - Office of the Tribal Advisor's Cultural Humility training can be accessed at: https://tribalaffairs.ca.gov/wp-content/uploads/sites/10/2020/11/OTA_Cultural-Humility-1.pdf

⁸ The Indian Health Service's Overview of Trauma-Informed Care and Historical Trauma training can be accessed at: <https://www.ihs.gov/mentalhealth/ticmandatorytraining/>

⁹ See APL 22-005 or any superseding APL.

NSMHS Outreach & Education Plan Culturally and Linguistically Appropriate Services (CLAS) Requirements

The Member and PCP outreach and education plans must meet national CLAS standards.¹⁰ All Member-facing materials and messaging must appropriately reflect the diverse needs of the MCP Member population as evident from the utilization assessment and incorporation of evidence-based best practices in stigma reduction.¹¹ MCPs are encouraged to work with their county Mental Health Services Act coordinator for additional guidance. Additionally, the MCP must ensure multiple points of contact for Members to access NSMHS.

Website Posting Requirements

MCPs must publicly post on their website, in an accessible manner, their annual DHCS-approved Member and PCP outreach and education plans. MCPs must also publicly post their utilization assessment that was used for the outreach and education plans. All publicly posted materials must exclude any personally identifiable information. Member and PCP outreach and education plan and utilization assessment submission timelines are detailed in Appendix A.

Outreach & Education Plan Implementation

MCPs must attest to implementing the approved outreach and education plans by email submission to DHCS at: MMCDHealthEducationMailbox@dhcs.ca.gov. The email must include the date of implementation and the URL to the website location of the NSMHS outreach and education plan and utilization assessment. Every December 31st, MCPs must submit new plans, updated plans, or attestations justifying why no updates are necessary. These email attestations must also include the date of updated plan implementation and the website location of the NSMHS outreach and education plan and utilization assessment.

Member Experience Assessment of NSMHS

MCPs must participate in the External Quality Review Organization Member Experience surveys to assess covered NSMHS. DHCS will use the Consumer Assessment of Healthcare Providers and Systems (CAHPS) Experience of Care and Health Outcomes (ECHO) survey, or a comparable survey, to assess Member satisfaction with the MCPs' coverage of NSMHS. DHCS may develop additional customized survey questions, in compliance with SB 1019 requirements, to assess specific problems and/or special

¹⁰ Information about National CLAS Standards can be found at:

<https://thinkculturalhealth.hhs.gov/clas>

¹¹ Stigma reduction resources are available at: <https://www.nami.org/Get-Involved/Pledge-to-Be-StigmaFree> and <https://www.nimh.nih.gov/about/organization/dar/stigma-and-discrimination-research-toolkit>.

populations. As per SB 1019 requirements, DHCS will publish report(s) summarizing the findings from the CAHPS ECHO, or comparable survey, as they relate to SB 1019, every three years. The first report will be available in April 2026, per SB 1019 requirements.

MCPs must review their contractually required policies and procedures (P&Ps) to determine if amendments are needed to comply with this APL. If the requirements contained in this APL, including any updates or revisions to this APL, necessitate a change in an MCP's contractually required P&Ps, the MCP must submit its updated P&Ps to its Managed Care Operations Division (MCPD) Contract Oversight SharePoint Submission Portal¹ within 90 days of the release of this APL. If an MCP determines that no changes to its P&Ps are necessary, the MCP must attach an attestation to the Portal within 90 days of the release of this APL stating that the MCP's P&Ps have been reviewed and no changes are necessary. The attestation must include the title of this APL as well as the applicable APL release date in the subject line.

MCPs are responsible for ensuring that their Subcontractors, Downstream Subcontractors, and Network Providers comply with all applicable state and federal laws and regulations, Contract requirements, and other DHCS guidance, including APLs and Policy Letters.¹² These requirements must be communicated by each MCP to all Subcontractors, Downstream Subcontractors, and Network Providers. DHCS may impose Corrective Action Plans (CAP), as well as administrative and/or monetary sanctions for non-compliance. For additional information regarding administrative and monetary sanctions, see APL 23-012 and any further iterations on this topic. Any failure to meet the requirements of this APL may result in a CAP and subsequent sanctions.

If you have any questions regarding this APL, please contact your MCPD Contract Manager.

Sincerely,

Original Signed by Dana Durham

Dana Durham, Chief
Managed Care Quality and Monitoring Division

¹² For more information on Subcontractors and Network Providers, including the definition and applicable requirements, see APL 19-001, and any subsequent APLs on this topic.

Appendix A: Deliverable Submission Timelines

Phase of Implementation	NSMHS Outreach & Education Plan Deliverables	Due No Later Than
Initial Implementation Phase	<ul style="list-style-type: none"> • Member and PCP NSMHS Outreach & Education Plan • NSMHS utilization assessment submission • Copy of MCP’s most recently approved Population Assessment used to develop plan 	December 31, 2024
Initial Implementation Phase	<ul style="list-style-type: none"> • MCP begins Member and PCP outreach and education of NSMHS based on plan submitted to DHCS • MCP updates website posting of DHCS-approved NSMHS outreach and education plan and utilization assessment 	January 1, 2025
Initial Implementation Phase	<ul style="list-style-type: none"> • If modifications to the outreach and education plan are requested by DHCS after MCP submission, MCP will address modifications in the written plan and return to DHCS for approval <ul style="list-style-type: none"> ○ Modifications must be implemented no later than January 1st of the following year 	June 30, 2025
Full Implementation Phase	New or updated annual submission of NSMHS outreach and education plans and utilization assessment	Every December 31 st
Full Implementation Phase	Update website posting of DHCS newly approved NSMHS outreach and education plans and utilization assessment	Every January 1 st

- MCPs must submit their new or updated Member and PCP outreach and education plans, as well as their utilization assessment and copy of the Population Assessment used to develop the plan, via email to MMCDHealthEducationMailbox@dhcs.ca.gov, with a carbon copy (cc) to their MCO Contract Manager.

- DHCS utilizes a standard review tool for assessing Member and PCP outreach and education plans that is informed at a minimum by consumer advocates, mental health stigma reduction experts, community-based organizations, and MCPs.¹³
- SB 1019 Member facing outreach and education materials (e.g., mailers, social media scripts) do not need to be submitted with the NSMHS Outreach and Education Plan on December 31, 2024. However, eligible Member facing materials must be submitted to DHCS per current MCP Contract requirements.

¹³ More information on approval standards is available in the full text of SB 1019.