

Workforce and Quality Incentive Program (WQIP)

October 10, 2024
MCP Stakeholder Webinar

Introduction

- » In addition to the Microsoft Teams webinar, members of the public may call in to +1 279-895-6425 and enter phone conference ID: 548 597 841#.
- » Please visit www.dhcs.ca.gov/AB186 for meeting materials and information on how to join upcoming meetings.
- » Stakeholders can sign up for the AB 186 email list serve at [this website](#).

Introductions

- » Kate Bravo, Health Program Specialist II, Quality and Population Health Management
- » Nick Leach, Capitated Rates Development Division Branch Chief, Health Care Financing

Agenda

- » Final Payment Process for WQIP
- » All Plan Letter (APL)
- » Exploring Consistent Format for Reporting to SNFs of Bed Days
- » Reminders
- » MCP Point of Contacts for WQIP
- » Public Comment

Final Payment Process for WQIP

New Final Payment Process for WQIP

- » DHCS published a **policy letter (PL) outlining the provisional guidance for the SNF WQIP to assist SNFs and MCPs with planning the reconciliation and payment processes** for CY 2023 final payments ([SNF WQIP PL 24-001 Provisional Guidance on SNF WQIP Payment Process](#)).
- » The PL was published to the SNF WQIP webpage and disseminated to SNF stakeholders on 7/2/2024.
- » Stated in the PL was a request that stakeholders provide feedback no later than within 15 calendar days.

Direction of Payment

- » **DHCS directs MCPs to make payments on a per-diem basis, rather than a lump sum basis.**
- » DHCS requires MCPs:
 - **To identifying WQIP-eligible days for payment purposes.**
 - Make per-diem payments to each facility for all qualifying bed days rendered and billed under a network agreement.
 - To include bed days under a network agreement and attributable to long-term care (LTC) claims, including bed hold days and discharge days, for CY 2023 dates of service billed by a qualifying facility (excludes hospice days and days where Medi-Cal was not the primary payer).
 - Net out any previously directed interim payment amounts from the final payment and, if applicable, recoup or withhold any amounts related to Class AA or A citations.
- » **Providers generally must submit claims to the MCP within 12 months of date of service.**

Class AA and A Citations

- » DHCS will direct **MCPs to withhold SNF WQIP payments for facilities with one or more Class AA or A citations** issued by the California Department of Public Health (CDPH) for violations that occurred wholly or in part in the program year (regardless of when violations are issued).
- » **DHCS will notify MCPs of any additional applicable Class AA and A citations** reported to DHCS by CDPH.
- » If DHCS or an MCP becomes aware of an applicable citation for a calendar year after the time of an interim or final payment, DHCS will require the MCP to recoup and withhold the applicable payments retroactively for that calendar year.
- » For citations that are appealed, DHCS will require MCPs to withhold the applicable payments until all appeals are exhausted and, if applicable, to release the applicable payments based on the final disposition of the citation, without regard to the length of the appeals process.
- » Class AA and A citation data sharing process is being discussed between CDPH and DHCS. Updates forthcoming.
- » In the rare scenario that a violation stretches between two PYs, the violation start date (first date) will be used to determine which PY the violation applies to.

Bed Day & Payment Reconciliation

» DHCS will require MCPs:

- **To establish policies and procedures to reconcile qualifying bed days with facilities.**
- **Provide member-level data to facilities detailing qualifying bed days in a machine-readable format on a regular basis (at least quarterly).**
- To establish policies and procedures to accept, acknowledge, and resolve provider grievances related to the processing or non-payment of SNF WQIP payments.
- To identify a single designated point of contact for providers for questions and technical assistance related to SNF WQIP ([MCP Contact List](#)).

Final Reporting & Payment Timeline

- » DHCS will **direct MCPs to calculate the number of SNF WQIP qualifying bed days and make payments to facilities** within 45 calendar days of receiving payment exhibits from DHCS or within 30 calendar days of receiving a clean claim from the provider, whichever is later.
- » **Payment exhibits will only include the final SNF WQIP score and per-diem** for each facility.
- » **DHCS will calculate the final separate payment term made by DHCS to MCPs** based on qualifying bed days reported by MCPs to the Post-Adjudicated Claims and Encounters System (PACES) by October 15, 2024, that have been accepted by DHCS, subject to actuarially appropriate adjustments.
- » **The October 15, 2024 deadline will not impact MCPs' obligations to make SNF WQIP per-diem payments** to each facility for all qualifying bed days rendered under a network agreement as detailed in the "Direction of Payment" section.

APL Update

All Plan Letter (APL) Update

- » DHCS is in the final phase of the APL process before it is disseminated for public comment.
- » The APL will follow standard DHCS policy for APLs and will be finalized after comments are received and edits made.

Exploring Consistent Format for Reporting to SNFs of Bed Days

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- » DHCS is exploring ways to implement consistent format requirements for reports to SNFs of bed days.
- » Looking for feedback regarding the capability of plans' internal systems.
 - » Please sent written feedback to the SNF WQIP Inbox at SNFWQIP@dhcs.ca.gov.

Reminders

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- » Importance of updating 274 files (if necessary).
 - Per [APL 16-019](#), MCPs are already responsible for submitting complete, accurate provider network information to DHCS.
 - MCPs are responsible for identifying WQIP qualifying days, so MCPs will be responsible for paying on days for contracted facilities, regardless of what shows on the 274 file.
 - Providers shouldn't be penalized due to inaccuracies in the MCP's 274 file (e.g. missing or inaccurate NPIs).
- » **The plans should be sharing their internal data to facilitate reconciliation with providers.**
 - DHCS is only sharing bed day data with MCPs to show them what is being reflected in the DHCS data warehouse.
- » Questions or concerns relating to SNF WQIP should be forwarded to the SNF WQIP inbox at SNFWQIP@dhcs.ca.gov.

MCP Point of Contacts for WQIP

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- » Update MCP contacts on the [MCP Contact List](#) for WQIP by emailing the SNF WQIP Inbox at SNFWQIP@dhcs.ca.gov.
 - Important that the MCPs contacts listed in the MCP Contact List are staff that are actively supporting the WQIP operations.
 - Some SNFs have reported that plans are not responsive when contacted numerous times.
 - DHCS recommends alignment between point of contact and LTSS liaison.

Public Comment

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- » DHCS welcomes public comment. DHCS staff may briefly respond to requests for clarification on this presentation.
- » Speakers are requested to introduce themselves and their organization.
- » Audience members are muted until they are called on by the moderator. Please use the “raise hand” button in Microsoft Teams to be added to the speaker queue. Once you are called on, you must unmute yourself in Microsoft Teams. If you are calling in, please press *5 to raise your hand.
- » Please provide any written questions or feedback to:
 - Workforce and Quality Incentive Program (WQIP) -- SNFWQIP@dhcs.ca.gov