

Federally Qualified Health Center Alternative Payment Model

Timelines



2024 Go-Live Timelines — January 1, 2025

September

Cohort 1A and 1B

- » **9/2:** FQHC opt-in/opt-out decisions for 1/1/25 participation for 1B cohort
- » **9/2:** Send list of cohort 1 A and B sites opting in with draft rates and Intermittent Clinics to MCPs for 1/1/2025
- » **9/2:** ICSOSR attestations due for 1A and 1B
- » **9/2–10/1:** DHCS reviews ICSOSR attestations for cohort 1 A and B for 2025
- » **9/16:** ***MCPs submit updated member rosters (regular twice-yearly cycle)***

Cohort 2

- » **9/23:** Webinar to announce timeline, application process, and summary of changes for cohort 2
- » **9/23:** Application for cohort 2 released

October

Cohort 1A and 1B

- » **10/1:** MEI released
- » **10/3:** 2025 capitation rates are sent to MCPs (statutory deadline)
- » **10/3:** APM PMPM due to FQHCs (statutory deadline)
- » **10/15:** A&I sets PPS rates for upcoming year and sends to Mercer for 1A and 1B; and notes which FQHCs do not receive MEI
- » Mercer finalizes FQHC APM PMPMs and capitation rates once MEI is announced
- » **10/31:** Final APM PMPM rates released including ICSOSR and MEI for October 2025–December 2025

Cohort 2

- » **10/1:** *FQHCs reach out to MCPs regarding their NPI participation in the APM*

2024 Go-Live Timelines — January 1, 2025

November

Cohort 1A and 1B

- » **11/1:** Send final list of cohort 1A and 1B sites, Intermittent sites and rates to MCPs for 1/1/25 programming including actual MEI
- » **11/30:** Readiness review attestations from MCPs and FQHCs due

Cohort 2

- » **11/1:** FQHCs and MCPs work to agree on member rosters for historic as well as current period
- » **11/15:** MCPs share rosters with FQHCs for submittal to DHCS
- » **11/20:** Last date for MCPs to be contacted by FQHCs for participation in Cohort 2

December

Cohort 1A and 1B

- » **1/1: Go-Live**
- » **2024 and 2025:** Pay for reporting only in the first year of APM, compared to 2023 (1A) and 2024 (1B) baseline

Cohort 2

- » **12/16:** FQHC application due
- » **12/16:** Rosters from MCPs due for parent and intermittent NPIs
- » **12/16:** Parent/IC NPI crosswalks due from FQHCs
- » **12/16-1/13:** DHCS reviews applications

2025 Timeline All Cohorts

January/February/March

All Cohorts

- » **3/30:** MCPs submit updated member rosters (regular twice yearly cycle)

Cohort 1A and 1B

- » **1/1:** Go-live for Cohort 1B
- » **2024 and 2025:** Pay for reporting only in the first year of APM, compared to 2023 (1A) and 2024 (1B) baseline

Cohort 2

- » **1/13-1/7:** Interview process for FQHCs
 - Meetings with MCPs
 - Data match for all NPIs conducted
 - Rosters for all NPIs analyzed
 - Parent/IC NPI crosswalks confirmed
- » **2/15:** FQHCs selected
 - Kick-off call with selected FQHCs and MCPs
 - Meeting series and communication channels with participating FQHCs and MCPs is established

April/May/June

All Cohorts

- » **4/30:** Mercer develops draft APM PMPM rates for all participating FQHCs
- » **5/30:** All IC change of ownership must be finalized for 1/1/2026 rating period
- » **6/1:** Draft APM PMPM rates released

Cohort 1A and 1B

Cohort 2

- » **7/1:** Deadline for selected FQHCs in cohort 2 to decline to participate is July 1

2025 Timeline All Cohorts

July/August/September

All Cohorts

- » **8/1:** Participating FQHCs submit interim scope changes if applicable, prior to August 1
- » **8/2-9/2:** DHCS reviews ICSOSR attestations for all cohorts
- » **9/16:** MCPs submit updated member rosters (regular twice yearly cycle)
- » Mercer develops MCP capitation rates

Cohort 1A and 1B

- » **7/5:** Last date for Cohort 1A or 1B sites to withdraw from APM

Cohort 2

- » **8/3:** Last date for cohort 2 sites to withdraw from APM
- » Send list of cohort 2 sites opting in with draft rates and Intermittent Clinics to MCPs for 1/1/2026
- » FQHCs and MCPs complete readiness activities including system testing/data exchange

2025 Timeline All Cohorts

October/November/December

All Cohorts

- » **10/1:** MEI released
- » **10/3:** Statutory deadlines for 2026 capitated rates and APM PMPM rates
- » **10/15:** 2026 PPS rates sent to Mercer; noting FQHCs not receiving MEI
- » Mercer finalizes FQHC APM PMPM and capitation rates
- » **10/31:** Final APM PMPM rates released including ICSOSR and MEI for October-December 2026
- » **11/1:** Send final list of cohort sites, Intermittent sites and rates to MCPs for 1/1/26 programming including actual MEI

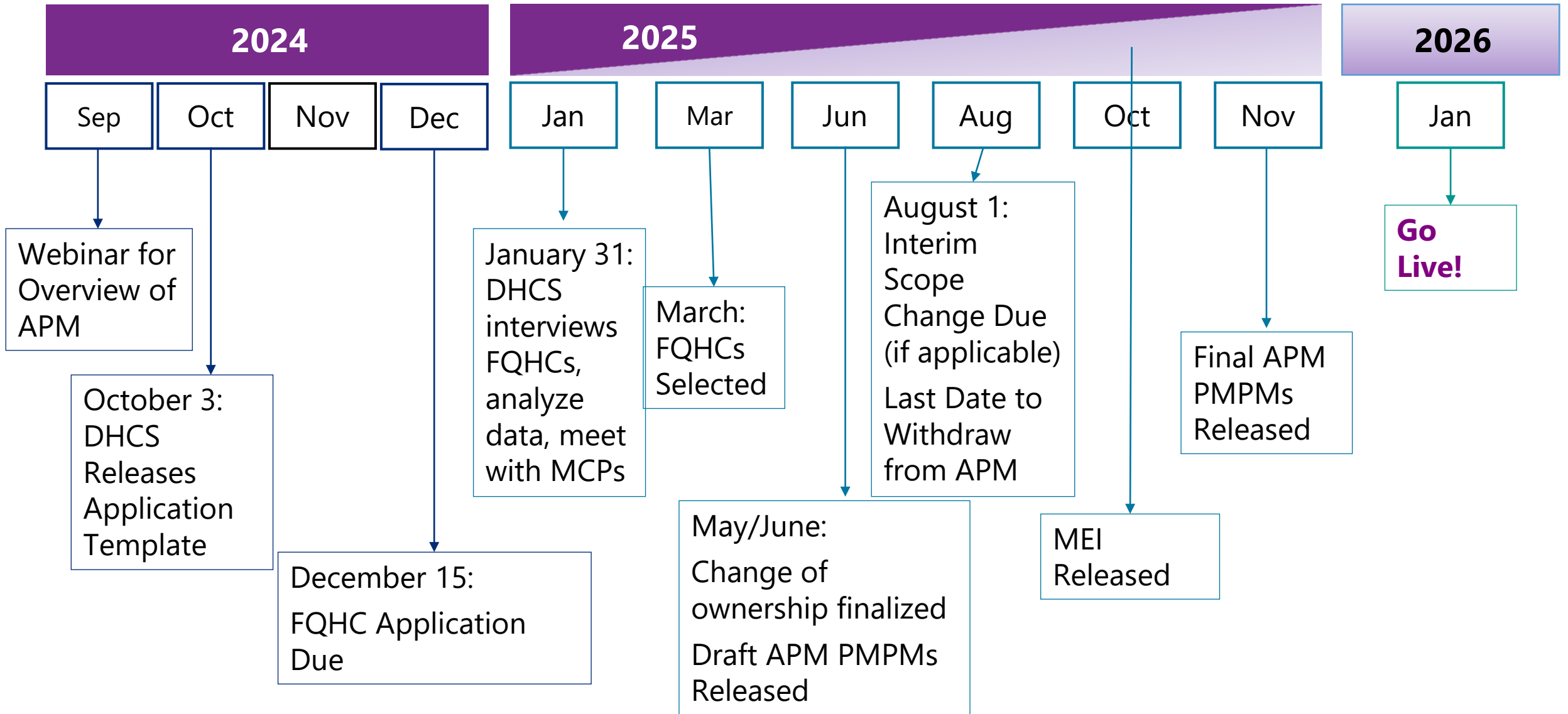
Cohort 2

- » **11/3:** Readiness review attestations due
- » **1/1: Go-Live**

Cohort 3

- » **11/1:** FQHCs and MCPs work on rosters
- » **11/15:** MCPs share rosters with FQHCs **11/20:** Last day for FQHCs to contact MCPs
- » **12/16:** FQHC application, MCP roster, Parent/IC NPI crosswalk due
- » **12/16-1/13:** DHCS reviews applications

DRAFT APM PMPM Timeline — Subject to Change



Baseline Periods for Rates Versus Quality

**PMPM
Calculation
Timeline**

***Baseline
financial data
for calculating
PMPM***

2023

*PMPM
implemented
starting 7/1/2024
Cohort 1A*

2025

*PMPM calculated
based on 2024
data

New FQHCs
starting 1/1/26
(SFY 2023–2024
base) Cohort2*



*PMPM calculated
based on SFY
2021–2022
data*

2024

*Cohort 1B
PMPM calculated
based on SFY
2022–2023 data
starting
1/1/2025*

2026

Baseline Periods for Rates Versus Quality

