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

January 2020

SENIOR CARE ACTION NETWORK (SCAN)
ANNUAL NETWORK CERTIFICATION
ASSURANCE OF COMPLIANCE REPORT

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1.   Overview

The Department of Health Care Services (DHCS) submits this January 2020 Assurance of Compliance Report to demonstrate that Senior Care Action Network (SCAN) is in compliance with the Annual Network Certification (ANC) components.[1]

DHCS contracts with SCAN to serve Medi-Cal members with specialized needs. Enrollment in SCAN is optional as there are full scope Medi-Cal managed care health plans (MCP) operating in the same service areas.

Senior Care Action Network Health Plan
SCAN is a Medicare Advantage Special Needs Plan that contracts with DHCS to provide Medi-Cal covered services, including home- and community-based services, to members who require nursing facility-level of care and nursing home custodial care. SCAN operates in Los Angeles, San Bernardino and Riverside counties and serves a subset of the dually eligible Medicare/Medi-Cal population. SCAN members must meet the following enrollment criteria:

- At least 65 years of age;
- Live in SCAN's service area;
- Have Medicare Parts A and B; and
- Have full-scope Medi-Cal with no share of cost.

Individuals with end-stage renal disease are not eligible for enrollment in SCAN. SCAN's coordinates and provides covered services through a delegated model that contracts with medical groups that contract with individual providers, physician groups, and hospitals.

This report details DHCS' approach and assessment of SCAN. The assessment results for SCAN are set forth in **Exhibit A**. DHCS will provide CMS with all ANC documentation submitted by SCAN and reviewed by DHCS, upon request.[2]

2.   SCAN Health Plan Annual Network Certification Assessment

DHCS ackowledges that all ANC components may not be applicable to SCAN based on their scope of services, population served and their specialized delivery structure; however, SCAN is required to address all ANC components, which include:

- Provider to Member Ratios
- Mental Health Provider to Member Ratios
- Mandatory Providers Types
- Time and Distance Standards

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[1] The 2019 July Assurance of Compliance provides further details on the ANC requirements and can be found at: https://www.dhcs.ca.gov/formsandpubs/Pages/NetworkAdequacy.aspx
[2] Title 42 Code of Federal Regulation (C.F.R.) section 438.207(e)

In the event the SCAN was unable to meet an ANC requirement, the MCP was required to submit a narrative to DHCS for review justifying the absence of specific provider types.

Due to SCAN's structure, SCAN submitted to DHCS narratives justifying the absence of the following provider types within the MCP's network:

- Freestanding Birthing Center;
- Certified Nurse Midwife; and
- Licensed Midwife.

SCAN submitted a narrative and a list of affiliated FQHCs, RHCS and IHFs that have entered into both direct contracts and downstream contracts for DHCS' review. Additionally, SCAN submitted Long-Term Services and Supports (LTSS) policies and procedures for DHCS' review to ensure timely access to CBAS, SNFs and ICFs for its members.

Additionally, SCAN submitted to DHCS for review and approval an Alternative Access Standard for time and distance requirements as described in **Section 3.** Upon reviewing SCAN's submission, DHCS approved the Alternative Access Standard for SCAN and determined SCAN's justification of the listed provider types as sufficient due to SCAN providing services to members 65 years of age or older. DHCS has determined that SCAN has demonstrated its delivery structure is capable of providing the appropriate level of care through its delegated delivery model and ensures access to its unique population of members.

3.   Alternative Access Standard Request Requirements

Welfare & Institutions Code (WIC) section 14197 authorizes DHCS to approve alternative access standard (AAS) requests for MCPs that cannot meet time and distance standards. Specifically, WIC section 14197(e)(1)(B) authorizes DHCS to approve an AAS request if DHCS determines that the requesting MCP has demonstrated that its delivery structure is capable of delivering the appropriate level of care and access.

3.1. Alternative Access Standard Request Process

Specialty MCPs, like SCAN, may request DHCS approval of an alternative to the required time and distance standards.[3] This process allows for specialty MCPs to justify their capability to deliver the appropriate level of care within their specialized delivery structure.

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[3] WIC section 14197(e)(1)(B)

DHCS approved SCAN's AAS request because the documentation submitted demonstrated that SCAN's delivery structure is capable of delivering the appropriate level of care and access to members they serve. SCAN has a limited but comprehensive network that renders services specific to the diagnoses of the members and ensures there is care coordination and support services across the continuum of care regardless of location.

4.   Determination

DHCS' assessment of the MCPs' submissions resulted in final determinations that are categorized into three designations: **Pass, AAS Pass** or **Pass with Conditions**.

- **Pass**: A Pass designation means the standards were met and/or an alternative access standard was approved for the MCP. No further action is needed from the MCP.
- **AAS Pass**: An AAS Pass designation means an alternate standard to time and distance was approved by DHCS based on the MCP's delivery structure in accordance to WIC 14197 as described in **Section 3.1.** No further action is needed from the MCP.
- **Pass with Conditions**: A Pass with Conditions designation means the MCP did not fully meet the standards, and as such, DHCS has imposed a temporary standard on the MCP. The temporary standard is established through a Corrective Action Plan (CAP) and imposes conditions and mandates applicable to the ANC component deficiency. MCPs placed under a CAP will continue to operate under the conditions of the temporary standard until all deficiencies specified under the CAP have been remediated and the CAP is closed.

EXHIBIT A
MCP – Specific Findings

MCP Name	Reporting Unit
SCAN Health Plan	Los Angeles County
SCAN Health Plan	Riverside County
SCAN Health Plan	San Bernardino County

MCP Name	Reporting Unit	Overall Result
SCAN Health Plan	Los Angeles County	Pass

Provider to Member Ratios	Results
PCP Ratio (1: 1,200)	Pass
Physician Extenders (1: 1,000)	N/A
Total Physician Ratio (1: 2,000)	Pass

Time and Distance Provider Types	Adult/Pediatric	Results
PCPs	Adult	AAS Pass[*]
PCPs	Pediatric	N/A
OB/GYN (Primary Care)	N/A	AAS Pass[*]
OB/GYN (Specialty Care)	N/A	AAS Pass[*]
Cardiology/ Interventional Cardiology	Adult	AAS Pass[*]
Dermatology	Adult	AAS Pass[*]
Endocrinology	Adult	AAS Pass[*]
ENT/ Otolaryngology	Adult	AAS Pass[*]
Gastroenterology	Adult	AAS Pass[*]
General Surgery	Adult	AAS Pass[*]
Hematology	Adult	AAS Pass[*]
HIV/AIDS Specialists/ Infectious Diseases	Adult	AAS Pass[*]
Nephrology	Adult	AAS Pass[*]
Neurology	Adult	AAS Pass[*]
Oncology	Adult	AAS Pass[*]
Ophthalmology	Adult	AAS Pass[*]
Orthopedic Surgery	Adult	AAS Pass[*]
Physical Medicine and Rehabilitation	Adult	AAS Pass[*]
Psychiatry	Adult	AAS Pass[*]
Pulmonology	Adult	AAS Pass[*]
Cardiology/ Interventional Cardiology	Pediatric	N/A
Dermatology	Pediatric	N/A
Endocrinology	Pediatric	N/A

Time and Distance Provider Types	Adult/Pediatric	Results
ENT/ Otolaryngology	Pediatric	N/A
Gastroenterology	Pediatric	N/A
General Surgery	Pediatric	N/A
Hematology	Pediatric	N/A
HIV/AIDS Specialists/ Infectious Diseases	Pediatric	N/A
Nephrology	Pediatric	N/A
Neurology	Pediatric	N/A
Oncology	Pediatric	N/A
Ophthalmology	Pediatric	N/A
Orthopedic Surgery	Pediatric	N/A
Physical Medicine and Rehabilitation	Pediatric	N/A
Psychiatry	Pediatric	N/A
Pulmonology	Pediatric	N/A
Mental Health Outpatient Services	Adult	AAS Pass[*]
Mental Health Outpatient Services	Pediatric	N/A
Hospitals	N/A	AAS Pass[*]
Pharmacies	N/A	AAS Pass[*]

Mandatory Provider Types	Results
Federally Qualified Health Center	Pass
Rural Health Clinic	Pass
Free – Standing Birthing Center	N/A
Indian Health Facilities	Pass
Licensed Midwife	N/A
Certified Nurse Midwife	N/A

Long Term Supports and Services (LTSS) – Policies and Procedures	Results
Community – Based Adult Services (CBAS)	Pass
Skilled Nursing Facility (SNF)	Pass
Intermediate Care Facility (ICF)	Pass

Alternative Access Standards Requests	Results
Alternative Access Standards Requests	AAS Pass[*]

Provider Validations	Results
Contracted Providers	Pass
Contracted Facilities	Pass

[*] Granted AAS per WIC 14197

MCP Name	Reporting Unit	Overall Result
SCAN Health Plan	Riverside County	Pass

Provider to Member Ratios	Results
PCP Ratio (1: 1,200)	Pass
Physician Extenders (1: 1,000)	N/A
Total Physician Ratio (1: 2,000)	Pass

Time and Distance Provider Types	Adult/Pediatric	Results
PCPs	Adult	AAS Pass[*]
PCPs	Pediatric	N/A
OB/GYN (Primary Care)	N/A	AAS Pass[*]
OB/GYN (Specialty Care)	N/A	AAS Pass[*]
Cardiology/ Interventional Cardiology	Adult	AAS Pass[*]
Dermatology	Adult	AAS Pass[*]
Endocrinology	Adult	AAS Pass[*]
ENT/ Otolaryngology	Adult	AAS Pass[*]
Gastroenterology	Adult	AAS Pass[*]
General Surgery	Adult	AAS Pass[*]
Hematology	Adult	AAS Pass[*]
HIV/AIDS Specialists/ Infectious Diseases	Adult	AAS Pass[*]
Nephrology	Adult	AAS Pass[*]
Neurology	Adult	AAS Pass[*]
Oncology	Adult	AAS Pass[*]
Ophthalmology	Adult	AAS Pass[*]
Orthopedic Surgery	Adult	AAS Pass[*]
Physical Medicine and Rehabilitation	Adult	AAS Pass[*]
Psychiatry	Adult	AAS Pass[*]
Pulmonology	Adult	AAS Pass[*]
Cardiology/ Interventional Cardiology	Pediatric	N/A
Dermatology	Pediatric	N/A
Endocrinology	Pediatric	N/A
ENT/ Otolaryngology	Pediatric	N/A
Gastroenterology	Pediatric	N/A
General Surgery	Pediatric	N/A
Hematology	Pediatric	N/A
HIV/AIDS Specialists/ Infectious Diseases	Pediatric	N/A
Nephrology	Pediatric	N/A
Neurology	Pediatric	N/A
Oncology	Pediatric	N/A

Time and Distance Provider Types	Adult/Pediatric	Results
Ophthalmology	Pediatric	N/A
Orthopedic Surgery	Pediatric	N/A
Physical Medicine and Rehabilitation	Pediatric	N/A
Psychiatry	Pediatric	N/A
Pulmonology	Pediatric	N/A
Mental Health Outpatient Services	Adult	AAS Pass[*]
Mental Health Outpatient Services	Pediatric	N/A
Hospitals	N/A	AAS Pass[*]
Pharmacies	N/A	AAS Pass[*]

Mandatory Provider Types	Results
Federally Qualified Health Center	Pass
Rural Health Clinic	Pass
Free – Standing Birthing Center	N/A
Indian Health Facilities	Pass
Licensed Midwife	N/A
Certified Nurse Midwife	N/A

Long Term Supports and Services (LTSS) – Policies and Procedures	Results
Community – Based Adult Services (CBAS)	Pass
Skilled Nursing Facility (SNF)	Pass
Intermediate Care Facility (ICF)	Pass

Alternative Access Standards Requests	Results
Alternative Access Standards Requests	AAS Pass[*]

Provider Validations	Results
Contracted Providers	Pass
Contracted Facilities	Pass

[*] Granted AAS per WIC 14197

MCP Name	Reporting Unit	Overall Result
SCAN Health Plan	**San Bernardino County**	**Pass**

Provider to Member Ratios	Results
PCP Ratio (1: 1,200)	Pass

Physician Extenders (1: 1,000)	N/A
Total Physician Ratio (1: 2,000)	Pass

Time and Distance Provider Types	Adult/Pediatric	Results
PCPs	Adult	AAS Pass*
PCPs	Pediatric	N/A
OB/GYN (Primary Care)	N/A	AAS Pass*
OB/GYN (Specialty Care)	N/A	AAS Pass*
Cardiology/ Interventional Cardiology	Adult	AAS Pass*
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ENT/ Otolaryngology	Adult	AAS Pass*
Gastroenterology	Adult	AAS Pass*
General Surgery	Adult	AAS Pass*
Hematology	Adult	AAS Pass*
HIV/AIDS Specialists/ Infectious Diseases	Adult	AAS Pass*
Nephrology	Adult	AAS Pass*
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Oncology	Adult	AAS Pass*
Ophthalmology	Adult	AAS Pass*
Orthopedic Surgery	Adult	AAS Pass*
Physical Medicine and Rehabilitation	Adult	AAS Pass*
Psychiatry	Adult	AAS Pass*
Pulmonology	Adult	AAS Pass*
Cardiology/ Interventional Cardiology	Pediatric	N/A
Dermatology	Pediatric	N/A
Endocrinology	Pediatric	N/A
ENT/ Otolaryngology	Pediatric	N/A
Gastroenterology	Pediatric	N/A
General Surgery	Pediatric	N/A
Hematology	Pediatric	N/A
HIV/AIDS Specialists/ Infectious Diseases	Pediatric	N/A
Nephrology	Pediatric	N/A
Neurology	Pediatric	N/A
Oncology	Pediatric	N/A
Ophthalmology	Pediatric	N/A
Orthopedic Surgery	Pediatric	N/A
Physical Medicine and Rehabilitation	Pediatric	N/A
Psychiatry	Pediatric	N/A
Pulmonology	Pediatric	N/A
Mental Health Outpatient Services	Adult	AAS Pass*
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Pharmacies	N/A	AAS Pass*

Mandatory Provider Types	Results
Federally Qualified Health Center	Pass
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Alternative Access Standards Requests	Results
Alternative Access Standards Requests	AAS Pass*

Provider Validations	Results
Contracted Providers	Pass
Contracted Facilities	Pass

* Granted AAS per WIC 14197