



JENNIFER KENT  
DIRECTOR

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



EDMUND G. BROWN JR.  
GOVERNOR

July 18, 2018

Charlene Giles, Chief Compliance Officer  
Health Plan San Joaquin  
7751 South Manthey Road  
French Camp, CA 95231

RE: Department of Health Care Services Medical Audit

Dear Ms. Giles:

The Department of Health Care Services (DHCS), Audits and Investigations Division conducted an on-site Medical Audit of Health Plan San Joaquin, a Managed Care Plan (MCP), from July 31, 2017 through August 9, 2017. The survey covered the period of July 1, 2016 through June 30, 2017.

On July 17, 2018, the MCP provided DHCS with additional information regarding its Corrective Action Plan (CAP) in response to the report originally issued on June 8, 2018.

All items have been reviewed and DHCS accepts the MCP's submitted CAP. The CAP is hereby closed. Full implementation of the CAP will be monitored on the subsequent audit. The enclosed report will serve as DHCS' final response to the MCP's CAP.

Please be advised that in accordance with Health & Safety Code Section 1380(h) and the Public Records Act, the final report will become a public document and will be made available on the DHCS website and to the public upon request.

If you have any questions, feel free to contact me at (916) 345-7831 or Michael Pank at (916) 345-7829.

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Sincerely,

Hannah Robins, Chief  
Compliance Unit

Enclosures: Attachment A CAP Response Form

cc: Janelle Gilmore, Contract Manager  
Department of Health Care Services  
Medi-Cal Managed Care Division  
P.O. Box 997413, MS 4408  
Sacramento, CA 95899-7413

**ATTACHMENT A  
Corrective Action Plan Response Form**



**Plan: Health Plan of San Joaquin**

**Audit Type:** Medical Audit and State Supported Services

**Review Period:** July 1, 2016 – June 30, 2017

MCPs are required to provide a CAP and respond to all documented deficiencies within 30 calendar days, unless an alternative timeframe is indicated in the letter. MCPs are required to submit the CAP via email in word format which will reduce turnaround time for DHCS to complete its review.

The CAP submission must include a written statement identifying the deficiency and describing the plan of action taken to correct the deficiency, and the operational results of that action. For deficiencies that require long term corrective action or a period of time longer than 30 days to remedy or operationalize, the MCP must demonstrate it has taken remedial action and is making progress toward achieving an acceptable level of compliance. The MCP will be required to include the date when full compliance is expected to be achieved.

DHCS will maintain close communication with the MCP throughout the CAP process and provide technical assistance to ensure the MCP provides sufficient documentation to correct deficiencies. Depending on the volume and complexity of deficiencies identified, DHCS may require the MCP to provide weekly updates, as applicable.

Deficiency Number and Finding	Action Taken	Supporting Documentation	Implementation Date* <small>(*anticipated or completed)</small>	DHCS Comments
<b>1. Utilization Management</b>				
N/A				

Deficiency Number and Finding	Action Taken	Supporting Documentation	Implementation Date* <small>(*anticipated or completed)</small>	DHCS Comments
<b>2. Case Management and Coordination of Care</b>				
<p><b>2.6 - Behavioral Health Treatment Plan Requirements</b></p> <p>Work with the delegate to ensure they provide clear direction on treatment plans to providers, and their policies and procedures comply with the Plan's contractual requirements along with the requirements specified in APL 18-006, which supersedes APL 15-025.</p>	<p>Beacon updated policy 14.7 to include all 13 elements outlined in APL 15-025.</p> <p>Created an audit tool including the 13 elements outlined in policy 14.7 and HPSJ will perform quarterly audit of randomly selected cases.</p> <p>Results to be presented during Quarterly Joint Operations and Delegation Oversight meetings.</p> <p>Updated HPSJ policy UM 62. Delegation Oversight to include performing audit and presentation of results to Committees.</p>	<p>Beacon Policy UM 14.7 Authorization Procedures for BHT</p> <p>Documentation audit tool</p> <p>HPSJ Policy UM 62 Delegation of Utilization Management</p>	<p>7/1/2018</p>	<p><b>07/05/18</b> – The following documentation supports the MCP's efforts to correct this deficiency:</p> <p>Beacon/College Health IPA (CHIPA):</p> <p>-Updated P&amp;P, UM14.7: Authorization Procedures for Applied Behavioral Analysis, Medi-Cal (03/28/18) which has been amended to fully address required elements (5,6,7, and 13) for a complete behavioral treatment plan as indicated in both APL 15-025 and APL 18-006.</p> <p>Clinical emergency calls (suicidal patient) are referred to a clinician to respond to the crisis and for assessment and triage.</p> <p>-Policy UM62: Delegation of Utilization Management requires the MCP to evaluate Delegate performance with quarterly audits and reporting results to the Joint Operations meetings and Delegation Oversight Committee and submit</p>

Deficiency Number and Finding	Action Taken	Supporting Documentation	Implementation Date* <small>(*anticipated or completed)</small>	DHCS Comments
				<p>corrective action plans based on committee recommendations.</p> <p>-Sample audit tool to include the 13 elements that make up a behavioral health treatment plan. Audits to be performed on a quarterly basis.</p> <p>-An email (07/17/18) which indicates that delegate requires providers to include an exit plan in the overall treatment plan - Medical Necessity Criteria (03/21/18) further outlines discharge criteria.</p> <p><b>This deficiency is closed</b></p>
<b>3. Access and Availability of Care</b>				
N/A				

Deficiency Number and Finding	Action Taken	Supporting Documentation	Implementation Date* <small>(*anticipated or completed)</small>	DHCS Comments
<b>4. Members' Rights</b>				
N/A				
<b>5. Quality Management</b>				
N/A				
<b>6. Administrative and Organizational Capacity</b>				
N/A				
<b>7. State Supported Services</b>				
N/A				

Submitted by: **Maria Aguglia**  
Title: **Director of CM/UM**

Date: **July 2, 2018**