



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



GAVIN NEWSOM
GOVERNOR

March 27, 2019

Mary Beth Corrado, CHC
Chief Compliance Officer
CalViva Health
7625 North Palm Avenue, Suite 109
Fresno, CA 93711

RE: Department of Health Care Services Medical Audit

Dear Ms. Corrado:

The Department of Health Care Services (DHCS), Audits and Investigations Division conducted an on-site Medical Audit of CalViva Health, a Managed Care Plan (MCP), from April 16, 2018 through April 27, 2018. The survey covered the period of April 1, 2017 through March 31, 2018.

On March 26, 2019, the MCP provided DHCS with additional information regarding its Corrective Action Plan (CAP) in response to the report originally issued on December 19, 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: Mary Cobb, 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: CalViva Health

Audit Type: Medical Audit and State Supported Services

Review Period: 4/1/17 – 3/31/18

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 that 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 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* (*anticipated or completed)	DHCS Comments
5. Quality Management				
5.2 Provider Qualifications The Plan failed to demonstrate that new providers received training within the ten	The Plan developed a process including a new provider attestation requirement to document training occurred within the 10 working day period.			01/18/19 – The following documentation supports the MCP’s efforts to correct this deficiency:

Deficiency Number and Finding	Action Taken	Supporting Documentation	Implementation on Date* (*anticipated or completed)	DHCS Comments
<p>(10) working day training requirement. Plan Policy #PV-201: Provider Orientation Program states new providers receive the welcome orientation packet within ten (10) days of being placed on active status. However, the provision of this policy does not specify the monitoring of the ten (10) working day training requirement.</p> <p>The Plan's provider relations department maintains logs and conducts oversight and monitoring to ensure that welcome packets are received. However, there is no documentation to support that the</p>	<p>Attestation Process</p> <p>1. The Attestation Form requires a provider to attest to:</p> <ul style="list-style-type: none"> receiving training materials and completed training; or training was completed online; and an understanding of responsibilities as a provider <p>2. The Attestation form is included in the new Provider Welcome Packets:</p> <ul style="list-style-type: none"> Welcome Letter - notifies providers to complete and submit the Attestation form Online – The form is available on the provider website (provider.healthnet.com) pre-log in under Provider Support <p>3. Attestation form and information included in new provider welcome kits mailings.</p> <p>New Provider Outreach</p>	<p>CalViva Health New Provider Training Attestation Form</p> <p>CalViva Health New Provider Welcome Letter https://www.healthnet.com/portal/provider/content/iwc/provider/unprotected/support_contact/content/onboarding.action</p>	<p>Form completed November 8, 2018</p> <p>Letter completed November 8, 2018</p> <p>Online as of November 8, 2018</p> <p>Mailing start November 19, 2018</p>	<p>-Attestation form – Confirmation of New Provider Training (11/18) as evidence that MCP requires new providers to acknowledge receipt of training materials and reviewed them for training purposes, or acknowledge completion of online training. Also serves as an acknowledgement of the provider's understanding of their responsibilities related to the MCP's managed care program services, policies and procedures, ways to communicate between providers, members and the MCP, along with how to access and find information on the provider website about benefits and services, claims and payment policies, referral processes, case management and the tools to care for a diverse population.</p> <p>-New Provider Welcome Packet which provides education materials and details about training available online to supplement the Medi-Cal</p>

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<p>welcome packet was received by the new providers, within the ten (10) working day requirement.</p> <p><u>RECOMMENDATION:</u> 5.2.1 Develop a system to demonstrate that new providers received training within the ten (10) working day training requirement.</p>	<p>To ensure the new providers understand their responsibilities, the Provider Relations Department will follow-up with new providers in the following ways:</p> <ul style="list-style-type: none"> • <i>Outbound Calls to Providers:</i> The Provider Relations Representative (PRR) will contact the new provider to confirm receipt of the Welcome-Orientation Packet. The PRR will also offer to conduct in-person training with the new provider. The PRR will ensure evidence of training by obtaining a signed attestation form or sign-in sheet for in-person trainings. • <i>Hand delivery of the Welcome packet:</i> Welcome kits will be hand delivered if the PRR did not confirm receipt of the Welcome packet by mail. • <i>In Person Training Presentation</i> 	<p>PV-201 Network Provider Training P&P describes outreach activities</p> <p>CalViva Health New Provider Training Presentation</p>	<p>November 18, 2018</p> <p>completed January 4, 2019</p>	<p>operations manuals in order to assist providers and staff in understanding and adhering to policies and procedures.</p> <p>-PowerPoint training, “New Provider Training” (01/04/19) that includes tools and resources to assist new providers and their staff. Training materials include, Medi-Cal Operation guide; both hard copy and electronic versions, education and operational tools, contracts, resources and provider communications relating to operational, regulatory and contractual changes.</p> <p>-Updated P&P, “PV-201: Network Provider Training” (12/18/18) that indicates the MCP will provide training on a continuous and as-needed basis regarding services, policies, special topics, and procedural changes. Training includes posting information on the provider portal, online training, in-</p>

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	<p>Reporting & Monitoring The PRR will track a provider's effective date and training completion date.</p> <p>Provider Relations management will follow up with PRR to discuss discrepancies of training dates outside of the ten (10) working day requirement.</p> <p>The monthly Provider Relations reports submitted to CalViva will include information about the results of new provider training. Reporting will start with Jan 2019 tracking data and will be reviewed at the Plan's March 2019 management oversight meeting.</p> <p>Implemented use of Daily Report from the contracting system, which lists all new providers.</p>	<p>PV-201 Network Provider Training P&P describes tracking and monitoring activities</p> <p>CalViva Health New Provider Database report</p> <p>CalViva Health PRR_Weekly Reminder</p> <p>CalViva Health Daily Report to PRR 03 06 19</p>	<p>November 18, 2018</p> <p>Tracking started with January 2019 activity and will be reported at March 2019 meeting and future meetings after that.</p> <p>Daily report started in March 2019</p>	<p>person training and other methods of educational outreach to providers. MCP to ensure all new providers receive training within 10 working days of being placed on active status.</p> <p>-MCP implemented a daily report from its contracting system that identifies all new providers. Report is validated by Provider Relations Department.</p> <p>Validated new provider reports are submitted to MCP fulfillment vendor at least twice weekly. Fulfillment vendor distributes Welcome Packet to each new provider within two business days.</p> <p>-New Provider Database includes the following: New provider active date Welcome packet mailing date Date new provider contacted by provider relations representative</p>

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	<p>Implemented Monthly Provider Relations report submitted to Plan's Management Oversight Meeting The specific report section is on page 1 and yellow highlighted in the attached Provider Relations Field Report. This report shows activity for the month of January 2019.</p> <p>Policy & Procedure</p> <p>The Plan's Policy and Procedure was revised to describe the above activities (attestation process, outreach, monitoring and reporting).</p>	<p>Monthly Provider Relations Field Report for March Oversight Meeting</p> <p>PV-201 Network Provider Training P&P</p>	<p>Submitted to 3/13/19 Management Oversight Meeting</p> <p>November 18, 2018</p>	<p>Type of training completed (online, in-person, self-study) Attestation form receipt date.</p> <p>03/26/19 – The following additional documentation submitted supports the MCP's efforts to correct this deficiency:</p> <p>-MCP Provider Relations Department generates monthly reports to ensure training and proof of training is completed within the 10 working days requirement. Report is submitted to MCP Management Oversight meeting. Report shows activity for the month of January 2019.</p> <p>This finding is closed.</p>

Submitted by: Greg Hund
Title: Chief Executive Officer

Date: January 18, 2019