
June 3, 2026

Tyler Sadwith, State Medicaid Director
California Department of Health Care Services
1501 Capitol Avenue, 6th Floor, MS 0000
Sacramento, CA 95814

Dear Tyler Sadwith:

In accordance with 42 CFR 438.6(c), the Centers for Medicare & Medicaid Services (CMS) has reviewed and is approving California's submission of a proposal for a state directed payment (SDP) under Medicaid managed care plan contract(s). The proposal was received by CMS on December 31, 2024, and a final revised preprint was received on December 30, 2025. The proposal has a control name of CA_VBP_NF_Renewal_20250101-20251231.

CMS has completed our review of the following Medicaid managed care SDP(s):

- Skilled Nursing Facility (SNF) Workforce and Quality Incentive Program (WQIP) established by the state for eligible providers for the rating period covering January 1, 2025 through December 31, 2025, incorporated in the capitation rates through a separate payment term amount up to \$304,825,403.

This letter satisfies the regulatory requirement in 42 CFR 438.6(c)(2) for SDPs described in 42 CFR 438.6(c)(1). This letter pertains only to the actions identified above and does not apply to other actions currently under CMS's review. This letter does not constitute approval of any specific Medicaid financing mechanism used to support the non-federal share of expenditures associated with these actions. All relevant federal laws and regulations apply. CMS reserves its authority to enforce requirements in the Social Security Act and the applicable implementing regulations.

Based on CMS's preliminary determination, this SDP proposal likely qualifies for the temporary grandfathering period in section 71116(b) of Public Law 119-21 (hereinafter referred to as "section 71116"). CMS acknowledges that this determination is preliminary in nature and policies will be finalized as part of notice and comment rulemaking. CMS will enforce all federal requirements, including section 71116, and CMS's assessment may be revised if further information is identified that alters the initial assessment.

Until the phase down required by section 71116 begins, the total dollar amount of a grandfathered SDP (as specified in item 4 of the current SDP preprint form) cannot increase and a state cannot increase this total dollar amount under any change or revision to the grandfathered SDP, including an amendment to the SDP, or subsequent renewal of this SDP for a future rating period. For rating periods beginning on or after January 1, 2028, grandfathered SDPs must comply with the specified phase down requirements.

The state is required to submit contract action(s) and related capitation rates that include all SDPs, including those that do not require written prior approval as specified in 42 CFR

438.6(c)(2)(i). Additionally, all SDPs must be addressed in the applicable rate certifications. CMS recommends that states share this letter and the preprint(s) with the certifying actuary. Documentation of all SDPs must be included in the initial rate certification as outlined in Section I, Item 4, Subsection D, of the [Medicaid Managed Care Rate Development Guide](#). The state and its actuary must ensure all documentation outlined in the Medicaid Managed Care Rate Development Guide is included in the initial rate certification. Failure to provide all required documentation in the rate certification will cause delays in CMS review.

Approval of this SDP proposal for the applicable rating period does not preclude CMS from requesting additional materials from the state, revision to the SDP proposal design, or any other modifications to the proposal for this rating period or future rating periods, if CMS determines that such modifications are required for the state to meet relevant federal requirements.

CMS is approving this preprint with a condition that the state provide CY 2023 and CY 2024 findings when they become available. Should the state have any questions, please contact the CMS Division of Quality and Health Outcomes via the ManagedCareQualityTA@cms.hhs.gov for technical assistance.

If you have any questions concerning this letter, please contact StateDirectedPayment@cms.hhs.gov.

Sincerely,

JOHN F.
GILES JR -S

Digitally signed by JOHN
F. GILES JR -S
Date: 2026.06.03
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John Giles
Director, Managed Care Group
Center for Medicaid and CHIP Services

Section 438.6(c) Preprint

42 C.F.R. § 438.6(c) provides States with the flexibility to implement delivery system and provider payment initiatives under MCO, PIHP, or PAHP Medicaid managed care contracts (i.e., state directed payments). 42 C.F.R. § 438.6(c)(1) describes types of payment arrangements that States may use to direct expenditures under the managed care contract. Under 42 C.F.R. § 438.6(c)(2)(ii), contract arrangements that direct an MCO's, PIHP's, or PAHP's expenditures under paragraphs (c)(1)(i) through (c)(1)(ii) and (c)(1)(iii)(B) through (D) must have written approval from CMS prior to implementation and before approval of the corresponding managed care contract(s) and rate certification(s). This preprint implements the prior approval process and must be completed, submitted, and approved by CMS before implementing any of the specific payment arrangements described in 42 C.F.R. § 438.6(c)(1)(i) through (c)(1)(ii) and (c)(1)(iii)(B) through (D). Please note, per the 2020 Medicaid and CHIP final rule at 42 C.F.R. § 438.6(c)(1)(iii)(A), States no longer need to submit a preprint for prior approval to adopt minimum fee schedules using State plan approved rates as defined in 42 C.F.R. § 438.6(a).

Submit all state directed payment preprints for prior approval to:

StateDirectedPayment@cms.hhs.gov.

SECTION I: DATE AND TIMING INFORMATION

1. Identify the State's managed care contract rating period(s) for which this payment arrangement will apply (for example, July 1, 2020 through June 30, 2021):
January 1, 2025 - December 31, 2025
2. Identify the State's requested start date for this payment arrangement (for example, January 1, 2021). *Note, this should be the start of the contract rating period unless this payment arrangement will begin during the rating period.* January 1, 2025
3. Identify the managed care program(s) to which this payment arrangement will apply:
Mainstream Managed Care Plans (County Organized Health Systems, Geographic Managed Care, Regional Model, Two-Plan Model, and Single-Plan Model), AIDS Healthcare Foundation, and SCAN Health Plan
4. Identify the estimated **total dollar amount** (federal and non-federal dollars) of this state directed payment: \$304,825,403
 - a. Identify the estimated federal share of this state directed payment: 50%
 - b. Identify the estimated non-federal share of this state directed payment: 50%

Please note, the estimated total dollar amount and the estimated federal share should be described for the rating period in Question 1. If the State is seeking a multi-year approval (which is only an option for VBP/DSR payment arrangements (42 C.F.R. § 438.6(c)(1)(i)-(ii))), States should provide the estimates per rating period. For amendments, states should include the change from the total and federal share estimated in the previously approved preprint.

5. Is this the initial submission the State is seeking approval under 42 C.F.R. § 438.6(c) for this state directed payment arrangement? Yes No

6. If this is not the initial submission for this state directed payment, please indicate if:
- a. The State is seeking approval of an amendment to an already approved state directed payment.
 - b. The State is seeking approval for a renewal of a state directed payment for a new rating period.
 - i. If the State is seeking approval of a renewal, please indicate the rating periods for which previous approvals have been granted:
CY 2023 and 2024
 - c. Please identify the types of changes in this state directed payment that differ from what was previously approved.
 - Payment Type Change
 - Provider Type Change
 - Quality Metric(s) / Benchmark(s) Change
 - Other; please describe:
- No changes from previously approved preprint other than rating period(s).
7. Please use the checkbox to provide an assurance that, in accordance with 42 C.F.R. § 438.6(c)(2)(ii)(F), the payment arrangement is not renewed automatically.

SECTION II: TYPE OF STATE DIRECTED PAYMENT

8. In accordance with 42 C.F.R. § 438.6(c)(2)(ii)(A), describe in detail how the payment arrangement is based on the utilization and delivery of services for enrollees covered under the contract. The State should specifically discuss what must occur in order for the provider to receive the payment (e.g., utilization of services by managed care enrollees, meet or exceed a performance benchmark on provider quality metrics).

SKILLED NURSING FACILITY (SNF) WORKFORCE AND QUALITY INCENTIVE PROGRAM (WQIP) - PROGRAM YEAR (PY) 3. The State will direct Medi-Cal managed care health plans (MCPs) to pay eligible network SNFs a uniform per-diem add-on rate for qualifying SNF services, as described in Attachment 1. A baseline per-diem add-on rate will be calculated by dividing the targeted program amount (\$304,825,403) by the projected number of qualifying SNF days. The State will evaluate each eligible SNF's performance on the WQIP performance measures and calculate a facility-specific WQIP score. The State will apply a linear curve to each facility's raw WQIP score using a uniform quality adjustment methodology across all eligible network SNFs. The baseline per-diem add-on rate will be adjusted based on the facility-specific, curved WQIP score, and that final amount will be paid for each qualifying SNF day. The State will direct MCPs to make enhanced payments for contracted days via All Plan Letter or similar instruction.

- a. Please use the checkbox to provide an assurance that CMS has approved the federal authority for the Medicaid services linked to the services associated with the SDP (i.e., Medicaid State plan, 1115(a) demonstration, 1915(c) waiver, etc.).
- b. Please also provide a link to, or submit a copy of, the authority document(s) with initial submissions and at any time the authority document(s) has been renewed/revised/updated.

CMS approved the CalAIM Section 1115 demonstration and CalAIM Section 1915(b) waiver on December 29, 2021, and multiple subsequent amendments. The latest approval letters are linked below:

<https://www.dhcs.ca.gov/provgovpart/Documents/CalAIM-Eval-Design-Approval.pdf>
<https://www.dhcs.ca.gov/provgovpart/Documents/CalAIM-1915b-Approval-Letter-Revised-STCs.pdf>

9. Please select the general type of state directed payment arrangement the State is seeking prior approval to implement. (Check all that apply and address the underlying questions for each category selected.)

- a. **VALUE-BASED PAYMENTS / DELIVERY SYSTEM REFORM:** In accordance with 42 C.F.R. § 438.6(c)(1)(i) and (ii), the State is requiring the MCO, PIHP, or PAHP to implement value-based purchasing models for provider reimbursement, such as alternative payment models (APMs), pay for performance arrangements, bundled payments, or other service payment models intended to recognize value or outcomes over volume of services; or the State is requiring the MCO, PIHP, or PAHP to participate in a multi-payer or Medicaid-specific delivery system reform or performance improvement initiative.

If checked, please answer all questions in Subsection IIA.

- b. **FEE SCHEDULE REQUIREMENTS:** In accordance with 42 C.F.R. § 438.6(c)(1)(iii)(B) through (D), the State is requiring the MCO, PIHP, or PAHP to adopt a minimum or maximum fee schedule for network providers that provide a particular service under the contract; or the State is requiring the MCO, PIHP, or PAHP to provide a uniform dollar or percentage increase for network providers that provide a particular service under the contract. **[Please note, per the 2020 Medicaid and CHIP final rule at 42 C.F.R. § 438.6(c)(1)(iii)(A), States no longer need to submit a preprint for prior approval to adopt minimum fee schedules using State plan approved rates as defined in 42 C.F.R. § 438.6(a).]**

If checked, please answer all questions in Subsection IIB.

SUBSECTION IIA: VALUE-BASED PAYMENTS (VBP) / DELIVERY SYSTEM REFORM (DSR):

This section must be completed for all state directed payments that are VBP or DSR. This section does not need to be completed for state directed payments that are fee schedule requirements.

10. Please check the type of VBP/DSR State directed payment the State is seeking prior approval for. *Check all that apply; if none are checked, proceed to Section III.*

- Quality Payment/Pay for Performance (Category 2 APM, or similar)
 Bundled Payment/Episode-Based Payment (Category 3 APM, or similar)
 Population-Based Payment/Accountable Care Organization (Category 4 APM, or similar)
 Multi-Payer Delivery System Reform
 Medicaid-Specific Delivery System Reform
 Performance Improvement Initiative
 Other Value-Based Purchasing Model

11. Provide a brief summary or description of the required payment arrangement selected above and describe how the payment arrangement intends to recognize value or outcomes over volume of services. If “other” was checked above, identify the payment model. The State should specifically discuss what must occur in order for the provider to receive the payment (e.g., meet or exceed a performance benchmark on provider quality metrics).

The State will direct MCPs to pay eligible network providers a per-visit add-on rate for qualifying SNF services. A baseline per-diem add-on rate will be calculated by dividing the targeted program amount (\$304,825,403) by the projected number of qualifying SNF days. Only providers that achieve all quality metrics will receive the full per-visit add-on rate; all other eligible network providers will receive a partial (discounted) add-on rate. The State will evaluate each eligible SNF's performance on the WQIP performance measures and calculate a facility-specific WQIP score. The State will apply a linear curve to each facility's raw WQIP score using a uniform quality adjustment methodology across all eligible network SNFs. The baseline per-diem add-on rate will be adjusted based on the facility-specific, curved WQIP score, and that final amount will be paid for each qualifying SNF day. Providers that score better on their WQIP performance measures will earn a higher per-visit add-on rate than lower-scoring providers. This creates an incentive for providers to achieve as high of a WQIP score as possible.

12. In Table 1 below, identify the measure(s), baseline statistics, and targets that the State will tie to provider performance under this payment arrangement (provider performance measures). Please complete all boxes in the row. To the extent practicable, CMS encourages states to utilize existing, validated, and outcomes-based performance measures to evaluate the payment arrangement, and recommends States use the [CMS Adult and Child Core Set Measures](#) when applicable. If the state needs more space, please use Addendum Table 1.A and check this box:

TABLE 1: Payment Arrangement Provider Performance Measures

Measure Name and NQF # (if applicable)	Measure Steward/ Developer ¹	Baseline ² Year	Baseline ² Statistic	Performance Measurement Period ³	Performance Target	Notes ⁴
<i>Example: Percent of High-Risk Residents with Pressure Ulcers – Long Stay</i>	<i>CMS</i>	<i>CY 2018</i>	<i>9.23%</i>	<i>Year 2</i>	<i>8%</i>	<i>Example notes</i>
a. See the Technical Appendix						
b.						
c.						
d.						
e.						

1. Baseline data must be added after the first year of the payment arrangement
 2. If state-developed, list State name for Steward/Developer.
 3. If this is planned to be a multi-year payment arrangement, indicate which year(s) of the payment arrangement that performance on the measure will trigger payment.
 4. If the State is using an established measure and will deviate from the measure steward's measure specifications, please describe here. Additionally, if a state-specific measure will be used, please define the numerator and denominator here.

13. For the measures listed in Table 1 above, please provide the following information:

- a.** Please describe the methodology used to set the performance targets for each measure.

Where possible, the State set benchmarks for metrics prior to the measurement period (Acuity-Adjusted Staffing Hour Metrics, Staffing Turnover Metric, MDS Clinical Metrics, and Claims-Based Clinical Metrics); however, the benchmarks for the Medi-Cal Disproportionate Share Metric will be set retrospectively for PY 3.

See the Technical Appendix for more details.

- b.** If multiple provider performance measures are involved in the payment arrangement, discuss if the provider must meet the performance target on each measure to receive payment or can providers receive a portion of the payment if they meet the performance target on some but not all measures?

There are multiple measures involved in the payment arrangement. Each provider will be scored on all of the measures and receive a specific WQIP score. This score will determine the amount of the base-level add-on that they will receive. The higher the score, the higher level of add-on they will receive.

- c.** For state-developed measures, please briefly describe how the measure was developed?

See the Technical Appendix for details.

14. Is the State seeking a multi-year approval of the state directed payment arrangement?

Yes No

- a. If this payment arrangement is designed to be a multi-year effort, denote the State's managed care contract rating period(s) the State is seeking approval for.
- b. If this payment arrangement is designed to be a multi-year effort and the State is **NOT** requesting a multi-year approval, describe how this application's payment arrangement fits into the larger multi-year effort and identify which year of the effort is addressed in this application.

This is the last year that the State will be operating this program. Prior preprint submissions were classified as a uniform add-on.

15. Use the checkboxes below to make the following assurances:

- a. In accordance with 42 C.F.R. § 438.6(c)(2)(iii)(A), the state directed payment arrangement makes participation in the value-based purchasing initiative, delivery system reform, or performance improvement initiative available, using the same terms of performance, to the class or classes of providers (identified below) providing services under the contract related to the reform or improvement initiative.
- b. In accordance with 42 C.F.R. § 438.6(c)(2)(iii)(B), the payment arrangement makes use of a common set of performance measures across all of the payers and providers.
- c. In accordance with 42 C.F.R. § 438.6(c)(2)(iii)(C), the payment arrangement does not set the amount or frequency of the expenditures.
- d. In accordance with 42 C.F.R. § 438.6(c)(2)(iii)(D), the payment arrangement does not allow the State to recoup any unspent funds allocated for these arrangements from the MCO, PIHP, or PAHP.

SUBSECTION IIB: STATE DIRECTED FEE SCHEDULES:

This section must be completed for all state directed payments that are fee schedule requirements. This section does not need to be completed for state directed payments that are VBP or DSR.

16. Please check the type of state directed payment for which the State is seeking prior approval. Check all that apply; if none are checked, proceed to Section III.

- a. Minimum Fee Schedule for providers that provide a particular service under the contract *using rates other than State plan approved rates*¹ (42 C.F.R. § 438.6(c)(1)(iii)(B))
- b. Maximum Fee Schedule (42 C.F.R. § 438.6(c)(1)(iii)(D))
- c. Uniform Dollar or Percentage Increase (42 C.F.R. § 438.6(c)(1)(iii)(C))

¹ Please note, per the 2020 Medicaid and CHIP final rule at 42 C.F.R. § 438.6(c)(1)(iii)(A), States no longer need to submit a preprint for prior approval to adopt minimum fee schedules that use State plan approved rates as defined in 42 C.F.R. § 438.6(a).

17. If the State is seeking prior approval of a fee schedule (options a or b in Question 16):

- a. Check the basis for the fee schedule selected above.
 - i. The State is proposing to use a fee schedule based on the **State-plan approved rates** as defined in 42 C.F.R. § 438.6(a).²
 - ii. The State is proposing to use a fee schedule based on the **Medicare or Medicare-equivalent rate**.
 - iii. The State is proposing to use a fee schedule based on an **alternative fee schedule established by the State**.
 1. If the State is proposing an alternative fee schedule, please describe the alternative fee schedule (e.g., 80% of Medicaid State-plan approved rate)
- b. Explain how the state determined this fee schedule requirement to be reasonable and appropriate.

18. If using a maximum fee schedule (option b in Question 16), please answer the following additional questions:

- a. Use the checkbox to provide the following assurance: In accordance with 42 C.F.R. § 438.6(c)(1)(iii)(C), the State has determined that the MCO, PIHP, or PAHP has retained the ability to reasonably manage risk and has discretion in accomplishing the goals of the contract.
- b. Describe the process for plans and providers to request an exemption if they are under contract obligations that result in the need to pay more than the maximum fee schedule.
- c. Indicate the number of exemptions to the requirement:
 - i. Expected in this contract rating period (estimate)
 - ii. Granted in past years of this payment arrangement
- d. Describe how such exemptions will be considered in rate development.

² Please note, per the 2020 Medicaid and CHIP final rule at 42 C.F.R. § 438.6(c)(1)(iii)(A), States no longer need to submit a preprint for prior approval to adopt minimum fee schedules that use State plan approved rates as defined in 42 C.F.R. § 438.6(a).

19. If the State is seeking prior approval for a uniform dollar or percentage increase (option c in Question 16), please address the following questions:

- a. Will the state require plans to pay a uniform dollar amount **or** a uniform percentage increase? (*Please select only one.*)
- b. What is the magnitude of the increase (e.g., \$4 per claim or 3% increase per claim?)
- c. Describe how will the uniform increase be paid out by plans (e.g., upon processing the initial claim, a retroactive adjustment done one month after the end of quarter for those claims incurred during that quarter).
- d. Describe how the increase was developed, including why the increase is reasonable and appropriate for network providers that provide a particular service under the contract

SECTION III: PROVIDER CLASS AND ASSESSMENT OF REASONABLENESS

20. In accordance with 42 C.F.R. § 438.6(c)(2)(ii)(B), identify the class or classes of providers that will participate in this payment arrangement by answering the following questions:

a. Please indicate which general class of providers would be affected by the state directed payment (check all that apply):

- inpatient hospital service
- outpatient hospital service
- professional services at an academic medical center
- primary care services
- specialty physician services
- nursing facility services
- HCBS/personal care services
- behavioral health inpatient services
- behavioral health outpatient services
- dental services
- Other:

b. Please define the provider class(es) (if further narrowed from the general classes indicated above).

Freestanding SNFs, including adult subacute units, as defined in Welfare and Institutions Code, Section 14126.024(l).

- c. Provide a justification for the provider class defined in Question 20b (e.g., the provider class is defined in the State Plan.) If the provider class is defined in the State Plan, please provide a link to or attach the applicable State Plan pages to the preprint submission. Provider classes cannot be defined to only include providers that provide intergovernmental transfers.

Given this SDP succeeds and builds on the QASP program, which rewards SNF quality, the State is including the same providers in the class that were included in the QASP program. All facility types below are excluded:

Distinct Part SNFs (including psychiatric facilities),
Institution for Medical Diseases (IMD) facilities,
SNFs with 100% of beds being STP beds,
Freestanding pediatric subacute care facility,
General acute care hospital,
Acute psychiatric hospital,
Intermediate care facility,
Special hospital,
Correctional treatment center,
Hospice facility,
Intermediate care facility/developmentally disabled-nursing,
Intermediate care facility/developmentally disabled continuous nursing,
Intermediate care facility (ICF)/developmental disable (DD), OR
License terminated by California Department of Public Health (CDPH) at any time during the program year.

21. In accordance with 42 C.F.R. § 438.6(c)(2)(ii)(B), describe how the payment arrangement directs expenditures equally, using the same terms of performance, for the class or classes of providers (identified above) providing the service under the contract.

The State will direct MCPs to make uniform, fixed-dollar add-on payments for qualifying contracted SNF days based on the utilization and delivery of services for Medi-Cal members. Payments will be in the form of a uniform per-diem increase for qualifying SNF services that is adjusted based on facility-specific performance on designated quality metrics following a uniform quality adjustment methodology across all eligible network SNFs. All eligible network SNFs will be measured on the same WQIP measures and scoring criteria, which will determine the percentage of the baseline per-diem add-on rate that will be paid by MCPs to each facility.

22. For the services where payment is affected by the state directed payment, how will the state directed payment interact with the negotiated rate(s) between the plan and the provider? Will the state directed payment:

- a. Replace the negotiated rate(s) between the plan(s) and provider(s).
b. Limit but not replace the negotiated rate(s) between the plans(s) and provider(s).
c. Require a payment be made in addition to the negotiated rate(s) between the plan(s) and provider(s).

23. For payment arrangements that are intended to require plans to make a payment in addition to the negotiated rates (as noted in option c in Question 22), please provide an analysis in Table 2 showing the impact of the state directed payment on payment levels for each provider class. This provider payment analysis should be completed distinctly for each service type (e.g., inpatient hospital services, outpatient hospital services, etc.).

This should include an estimate of the base reimbursement rate the managed care plans pay to these providers as a percent of Medicare, or some other standardized measure, and the effect the increase from the state directed payment will have on total payment. *Ex: The average base payment level from plans to providers is 80% of Medicare and this SDP is expected to increase the total payment level from 80% to 100% of Medicare.*

If the state needs more space, please use Addendum 2.A and check this box:

TABLE 2: Provider Payment Analysis

Provider Class(es)	Average Base Payment Level from Plans to Providers (absent the SDP)	Effect on Total Payment Level of State Directed Payment (SDP)	Effect on Total Payment Level of Other SDPs	Effect on Total Payment Level of Pass-Through Payments (PTPs)	Total Payment Level (after accounting for all SDPs and PTPs)
<i>Ex: Rural Inpatient Hospital Services</i>	80%	20%	N/A	N/A	100%
a.					
b.					
c.					
d.					
e.					
f.					
g.					

24. Please indicate if the data provided in Table 2 above is in terms of a percentage of:

- a. Medicare payment/cost
- b. State-plan approved rates as defined in 42 C.F.R. § 438.6(a) (*Please note, this rate cannot include supplemental payments.*)
- c. Other; Please define: Average Commercial Rate

25. Does the State also require plans to pay any other state directed payments for providers eligible for the provider class described in Question 20b? Yes No

If yes, please provide information requested under the column "Other State Directed Payments" in Table 2.

- 26.** Does the State also require plans to pay pass-through payments as defined in 42 C.F.R. § 438.6(a) to any of the providers eligible for any of the provider class(es) described in Question 20b? Yes No

If yes, please provide information requested under the column “Pass-Through Payments” in Table 2.

- 27.** Please describe the data sources and methodology used for the analysis provided in response to Question 23.

The average base payment levels from MCPs to providers as well as the total applicable unit counts are estimated based on unit costs and utilization assumed in the CY 2025 Medi-Cal managed care capitation rates for each applicable program, as well as class-specific unit share and unit cost differentials. The class-specific unit share and unit cost differentials are as compared to the total units and average unit cost across all providers, and are based on a review of MCP-submitted supplemental data. The SDP is converted to an add-on unit cost based on the sub-pool amounts and the estimated total applicable unit counts.

Percentages represent a comparison to the 2023 average commercial rate (ACR), the cost per day of a semi-private room for nursing home care in California. The unit cost benchmarks are California- and nursing home care-specific from CY 2023, sourced from the median cost data tables of a cost of care survey published by Genworth.

A meaningful comparison of payment rates between two different time periods requires considerations for the change in the price of services over time, or trend, from one period to the other. In the 2024 Final Rule preamble, CMS indicated that § 438.6(c)(2)(iii)(A) was intended to align with the rate development standards outlined in § 438.5. Rate development standards outlined in § 438.5 require that actuarially sound capitation rates include the application of cost trend factors. In the actuary's professional judgment, comparing commercial unit cost levels from a prior period to projected Medicaid unit cost levels in the rating period without the consideration for inflation and other unit cost changes in the interim, deviates from generally accepted actuarial principles and practices. Such a comparison is being performed by CMS request.

The other SDP applicable to this class is the LTC FFS-equivalent SDP.

- 28.** Please describe the State's process for determining how the proposed state directed payment was appropriate and reasonable.

As shown in Table 2, the total payment levels from plans to providers, after accounting for all SDPs and PTPs, fall below the ACR.

SECTION IV: INCORPORATION INTO MANAGED CARE CONTRACTS

- 29.** States must adequately describe the contractual obligation for the state directed payment in the state's contract with the managed care plan(s) in accordance with 42 C.F.R. § 438.6(c). Has the state already submitted all contract action(s) to implement this state directed payment? Yes No

a. If yes:

- i.** What is/are the state-assigned identifier(s) of the contract actions provided to CMS?

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- ii.** Please indicate where (page or section) the state directed payment is captured in the contract action(s).

Exhibit B in section 1.1.14

b. If no, please estimate when the state will be submitting the contract actions for review.

SECTION V: INCORPORATION INTO THE ACTUARIAL RATE CERTIFICATION

Note: Provide responses to the questions below for the first rating period if seeking approval for multi-year approval.

30. Has/Have the actuarial rate certification(s) for the rating period for which this state directed payment applies been submitted to CMS? Yes No

a. If no, please estimate when the state will be submitting the actuarial rate certification(s) for review.

b. If yes, provide the following information in the table below for each of the actuarial rate certification review(s) that will include this state directed payment.

Table 3: Actuarial Rate Certification(s)

Control Name Provided by CMS (List each actuarial rate certification separately)	Date Submitted to CMS	Does the certification incorporate the SDP?	If so, indicate where the state directed payment is captured in the certification (page or section)
i. MCR-CA-COHS-GMC-REGIONAL-SINGLEPLAN-TWOPLAN-20250101-20251231-CERTIFICATION-20241220	12/30/2024	Yes	Current certification identifies a uniform dollar add-on, will be adjusted to capture as a VBP.
ii. MCR-CA-AHF-20250101-20251231-CERTIFICATION-20241224	12/27/2024	Yes	Current certification identifies a uniform dollar add-on, will be adjusted to capture as a VBP.
iii. CY 2025 SCAN (Control name TBD)	12/23/2024	Yes	Current certification identifies a uniform dollar add-on, will be adjusted to capture as a VBP.
iv.			
v.			

Please note, states and actuaries should consult the most recent [Medicaid Managed Care Rate Development Guide](#) for how to document state directed payments in actuarial rate certification(s). The actuary’s certification must contain all of the information outlined; if all required documentation is not included, review of the certification will likely be delayed.)

c. If not currently captured in the State’s actuarial certification submitted to CMS, note that the regulations at 42 C.F.R. § 438.7(b)(6) requires that all state directed payments are documented in the State’s actuarial rate certification(s). CMS will not be able to approve the related contract action(s) until the rate certification(s) has/have been amended to account for all state directed payments. Please provide an estimate of when the State plans to submit an amendment to capture this information.

Not applicable

- 31.** Describe how the State will/has incorporated this state directed payment arrangement in the applicable actuarial rate certification(s) (please select one of the options below):
- a. An adjustment applied in the development of the monthly base capitation rates paid to plans.
 - b. Separate payment term(s) which are captured in the applicable rate certification(s) but paid separately to the plans from the monthly base capitation rates paid to plans.
 - c. Other, please describe:
- 32.** States should incorporate state directed payment arrangements into actuarial rate certification(s) as an adjustment applied in the development of the monthly base capitation rates paid to plans as this approach is consistent with the rate development requirements described in 42 C.F.R. § 438.5 and consistent with the nature of risk-based managed care. For state directed payments that are incorporated in another manner, particularly through separate payment terms, provide additional justification as to why this is necessary and what precludes the state from incorporating as an adjustment applied in the development of the monthly base capitation rates paid to managed care plans.
- The rate certifications will provide the methodology that the State will use to determine actual payments associated with this payment arrangement. The estimated impacts of this payment arrangement on a PMPM basis will be provided in a supporting exhibit, but the estimated PMPM add-ons will not be included in the final rate ranges. An interim and final payment is necessary to calculate and pay on actual utilization, adjusted for quality, and to meet the objectives outlined in the quality strategy to deliver effective, efficient, affordable care.
- 33.** In accordance with 42 C.F.R. § 438.6(c)(2)(i), the State assures that all expenditures for this payment arrangement under this section are developed in accordance with 42 C.F.R. § 438.4, the standards specified in 42 C.F.R. § 438.5, and generally accepted actuarial principles and practices.

SECTION VI: FUNDING FOR THE NON-FEDERAL SHARE

- 34.** Describe the source of the non-federal share of the payment arrangement. Check all that apply:
- a. State general revenue
 - b. Intergovernmental transfers (IGTs) from a State or local government entity
 - c. Health Care-Related Provider tax(es) / assessment(s)
 - d. Provider donation(s)
 - e. Other, specify:
- 35.** For any payment funded by **IGTs (option b in Question 34)**,
- a. Provide the following (respond to each column for all entities transferring funds). If the state needs more space, please use Addendum Table 4.A and check this box:

Table 4: IGT Transferring Entities

Name of Entities transferring funds (enter each on a separate line)	Operational nature of the Transferring Entity (State, County, City, Other)	Total Amounts Transferred by This Entity	Does the Transferring Entity have General Taxing Authority? (Yes or No)	Did the Transferring Entity receive appropriations? If not, put N/A. If yes, identify the level of appropriations	Is the Transferring Entity eligible for payment under this state directed payment? (Yes or No)
i.					
ii.					
iii.					
iv.					
v.					
vi.					
vii.					
viii.					
ix.					
x.					

- b. Use the checkbox to provide an assurance that no state directed payments made under this payment arrangement funded by IGTs are dependent on any agreement or arrangement for providers or related entities to donate money or services to a governmental entity.
- c. Provide information or documentation regarding any written agreements that exist between the State and healthcare providers or amongst healthcare providers and/or related entities relating to the non-federal share of the payment arrangement. This should include any written agreements that may exist with healthcare providers to support and finance the non-federal share of the payment arrangement. Submit a copy of any written agreements described above.

36. For any state directed payments funded by provider taxes/assessments (option c in Question 34),

- a. Provide the following (respond to each column for all entries). If there are more entries than space in the table, please provide an attachment with the information requested in the table.

Table 5: Health Care-Related Provider Tax/Assessment(s)

Name of the Health Care-Related Provider Tax / Assessment (enter each on a separate line)	Identify the permissible class for this tax / assessment	Is the tax / assessment broad-based?	Is the tax / assessment uniform?	Is the tax / assessment under the 6% indirect hold harmless limit?	If not under the 6% indirect hold harmless limit, does it pass the "75/75" test?	Does it contain a hold harmless arrangement that guarantees to return all or any portion of the tax payment to the tax payer?
i.						
ii.						
iii.						
iv.						
v.						

- b. If the state has any waiver(s) of the broad-based and/or uniform requirements for any of the health care-related provider taxes/assessments, list the waiver(s) and its current status:

Table 6: Health Care-Related Provider Tax/Assessment Waivers

Name of the Health Care-Related Provider Tax/Assessment Waiver (enter each on a separate line)	Submission Date	Current Status (Under Review, Approved)	Approval Date
i.			
ii.			
iii.			
iv.			
v.			

37. For any state directed payments funded by **provider donations (option d in Question 34)**, please answer the following questions:

- a. Is the donation bona-fide? Yes No
- b. Does it contain a hold harmless arrangement to return all or any part of the donation to the donating entity, a related entity, or other provider furnishing the same health care items or services as the donating entity within the class?
 Yes No

38. **For all state directed payment arrangements**, use the checkbox to provide an assurance that in accordance with 42 C.F.R. § 438.6(c)(2)(ii)(E), the payment arrangement does not condition network provider participation on the network provider entering into or adhering to intergovernmental transfer agreements.

SECTION VII: QUALITY CRITERIA AND FRAMEWORK FOR ALL PAYMENT ARRANGEMENTS

- 39.** Use the checkbox below to make the following assurance, “In accordance with 42 C.F.R. § 438.6(c)(2)(ii)(C), the State expects this payment arrangement to advance at least one of the goals and objectives in the quality strategy required per 42 C.F.R. § 438.340.”
- 40.** Consistent with 42 C.F.R. § 438.340(d), States must post the final quality strategy online beginning July 1, 2018. Please provide:
- a.** A hyperlink to State’s most recent quality strategy: <https://www.dhcs.ca.gov/services/Documents/2025-Comprehensive-Quality-Strategy.pdf>
 - b.** The effective date of quality strategy. **January 1, 2025**
- 41.** If the State is currently updating the quality strategy, please submit a draft version, and provide:
- a.** A target date for submission of the revised quality strategy (month and year):
 - b.** Note any potential changes that might be made to the goals and objectives.

Note: The State should submit the final version to CMS as soon as it is finalized. To be in compliance with 42 C.F.R. § 438.340(c)(2) the quality strategy must be updated no less than once every 3-years.

42. To obtain written approval of this payment arrangement, a State must demonstrate that each state directed payment arrangement expects to advance at least one of the goals and objectives in the quality strategy. In the Table 7 below, identify the goal(s) and objective(s), as they appear in the Quality Strategy (include page numbers), this payment arrangement is expected to advance. If additional rows are required, please attach.

Table 7: Payment Arrangement Quality Strategy Goals and Objectives

Goal(s)	Objective(s)	Quality strategy page
<i>Example: Improve care coordination for enrollees with behavioral health conditions</i>	<i>Example: Increase the number of managed care patients receiving follow-up behavior health counseling by 15%</i>	5
a. Engaging Members in their Care		62
b. Providing Whole-Person Care for High-Risk Populations		65
c.		
d.		

43. Describe how this payment arrangement is expected to advance the goal(s) and objective(s) identified in Table 7. If this is part of a multi-year effort, describe this both in terms of this year’s payment arrangement and in terms of that of the multi-year payment arrangement.

The launch of WQIP is contemporaneous with the carve-in of SNF services to the Medi-Cal managed care delivery system across the State and, thus, represents an opportunity to better provide care for vulnerable members across the continuum of care. MCPs will have greater responsibility for these members, greater responsibility for care coordination and transitions of care, and a greater focus on the quality of care being given in the facilities. In the past, these two sectors (MCPs and facilities) have not been as closely linked – WQIP and the carve-in will make that linkage more robust and give opportunity for even greater improvement of care for members. The clearest example of this linkage is the addition of 3 CMS claims-based measures to the DHCS Managed Care Accountability Set (MCAS). In addition, there are clear transition of care requirements for MCPs in the Population Health Management Program.

44. Please complete the following questions regarding having an evaluation plan to measure the degree to which the payment arrangement advances at least one of the goals and objectives of the State's quality strategy. To the extent practicable, CMS encourages States to utilize existing, validated, and outcomes-based performance measures to evaluate the payment arrangement, and recommends States use the [CMS Adult and Child Core Set Measures](#), when applicable.

- a.** In accordance with 42 C.F.R. § 438.6(c)(2)(ii)(D), use the checkbox to assure the State has an evaluation plan which measures the degree to which the payment arrangement advances at least one of the goals and objectives in the quality strategy required per 42 C.F.R. § 438.340, and that the evaluation conducted will be *specific* to this payment arrangement. *Note:* States have flexibility in how the evaluation is conducted and may leverage existing resources, such as their 1115 demonstration evaluation if this payment arrangement is tied to an 1115 demonstration or their External Quality Review validation activities, as long as those evaluation or validation activities are *specific* to this payment arrangement and its impacts on health care quality and outcomes.

- b. Describe how and when the State will review progress on the advancement of the State’s goal(s) and objective(s) in the quality strategy identified in Question 42. For each measure the State intends to use in the evaluation of this payment arrangement, provide in Table 8 below: 1) the baseline year, 2) the baseline statistics, and 3) the performance targets the State will use to track the impact of this payment arrangement on the State’s goals and objectives. Please attach the State’s evaluation plan for this payment arrangement.

TABLE 8: Evaluation Measures, Baseline and Performance Targets

Measure Name and NQF # (if applicable)	Baseline Year	Baseline Statistic	Performance Target	Notes ¹
<i>Example: Flu Vaccinations for Adults Ages 19 to 64 (FVA-AD); NQF # 0039</i>	<i>CY 2019</i>	<i>34%</i>	<i>Increase the percentage of adults 18–64 years of age who report receiving an influenza vaccination by 1 percentage point per year</i>	<i>Example notes</i>
i. See Table 8.A				
ii.				
iii.				
iv.				

1. If the State will deviate from the measure specification, please describe here. If a State-specific measure will be used, please define the numerator and denominator here. Additionally, describe any planned data or measure stratifications (for example, age, race, or ethnicity) that will be used to evaluate the payment arrangement.

- c. If this is any year other than year 1 of a multi-year effort, describe (or attach) prior year(s) evaluation findings and the payment arrangement's impact on the goal(s) and objective(s) in the State's quality strategy. Evaluation findings must include 1) historical data; 2) prior year(s) results data; 3) a description of the evaluation methodology; and 4) baseline and performance target information from the prior year(s) preprint(s) where applicable. If full evaluation findings from prior year(s) are not available, provide partial year(s) findings and an anticipated date for when CMS may expect to receive the full evaluation findings.

The State provided the CY 2023 evaluation on June 4, 2025. The State estimates submitting the CY 2024 evaluation on June 5, 2026.

PREPRINT SECTION III: PROVIDER CLASS AND ASSESSMENT OF REASONABLENESS
 ADDENDUM TABLE 2.A. PROVIDER PAYMENT ANALYSES

Directions

2. For payment arrangements that are intended to require plans to make a payment in addition to the negotiated rates (as noted in option c in Question 22 of the State Directed Payment preprint file), please use the rows in Table 2.A below to add provider classes to Table 2 and an analysis showing the impact of the SDP on payment levels for each additional provider class. States may also use Table 2.A in lieu of completing Table 2 in the preprint. Input data only in beige cells in columns B - G.

States should only submit the tables they populate to CMS; please do not submit the entire workbook unless the State inputs data into Tables 1.A - 8.A. For example, if the state only needs extra rows to complete Table 2 in the preprint, please delete Tabs 1.A and 3.A - 8.A. CMS requests States submit the addendum tables with the preprint in this Excel format; please do not merge and re-PDF the preprint.

TABLE 2.A: Provider Payment Analyses

Data Format	Percentage of Commercial ^{1,2}	Provider Class(es)	Program	Average Base Payment Level from Plans to Providers (absent the SDP)	Effect on Total Payment Level of SDP	Effect on Total Payment Level of Other SDPs	Effect on Total Payment Level of Pass-Through Payments (PTPs)	Total Payment Level (after accounting for all SDPs and PTPs)
		Free text		Percent (#.#%)	Percent (#.#%)	Percent (#.#%) or N/A	Percent (#.#%) or N/A	Percent (#.#%)
Example		Rural Isolated Hospital Services		80.0%	20.0%	N/A	N/A	100.0%
a		LTC Services – Mainstream	Mainstream	80.51%	4.22%	-0.00%	0.00%	84.54%
b		LTC Services – SCAN	SCAN	87.00%	4.22%	0.00%	0.00%	91.22%
c		LTC Services – AIDS Healthcare Foundation	AIDS Healthcare Foundation	96.11%	1.85%	0.00%	0.00%	97.96%
d								
e								
f								
g								
h								
i								
j								
k								
l								
m								
n								
o								
p								
q								
r								
s								
t								
u								
v								
w								
x								
y								
aa								
ab								
ac								
ad								
ae								
af								
ag								
ah								
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aj								
ak								
al								
am								
an								
ao								
ap								
aq								
ar								
as								
at								
au								
av								
aw								
ax								
ay								
az								
baa								
bab								
bac								
bad								
bae								
baf								
bag								
bah								
bai								
bj								
bj								
bkk								
bl								
blmm								
blnn								
bloo								
blpp								
blqq								
blrr								
blss								
blt								
bluu								
blvv								
blww								
blxx								
blyy								
blzz								

Footnotes:
 1. A meaningful comparison of payment rates between two different time periods requires considerations for the change in the price of services over time, or trend, from one period to the other. In the 2024 Final Rule preamble, CMS indicated that § 438.6(j)(2)(ii)(A) was intended to align with the rate development standards outlined in § 438.5. Rate development standards outlined in § 438.5 require that actuarially sound capitation rates include the application of cost trend factors. In the actuary's professional judgment, comparing commercial unit cost levels from a prior period to projected Medicaid unit cost levels in the rating period without the consideration for inflation and other unit cost changes in the interim, deviates from generally accepted actuarial principles and practices. Such a comparison is being performed by CMS request.
 2. Percentages represent a comparison of projected CY 2025 Medi-Cal to 2023 ACIs for nursing facilities services.

PREPRINT SECTION VII: QUALITY CRITERIA AND FRAMEWORK FOR ALL PAYMENT ARRANGEMENTS
ADDENDUM TABLE 8.A: EVALUATION MEASURES, BASELINE AND PERFORMANCE TARGETS

Directions

8. Use Table 8.A below to add each measure the State intends to use in the evaluation of this payment arrangement, including (1) the baseline year, (2) the baseline statistic, and (3) the performance targets the State will use to track the impact of the payment arrangement on the State's goals and objectives. States may also use Table 8.A in lieu of completing Table 8 in the preprint. Input data only in beige cells in columns B - F.

States should only submit the tables they populate to CMS; please do not submit the entire workbook unless the State inputs data into Tables 1.A - 8.A. For example, if the State only needs extra rows to complete Table 8 in the preprint, please delete Table 1.A - 7.A. CMS requests States submit the addendum tables with the preprint in the Excel format; please do not merge and re-PDF the preprint.

TABLE 8.A: Evaluation Measures, Baseline and Performance Targets

Column	Measure Name and NQF # (if applicable)	Baseline Year	Baseline Statistic (NOTE: this represents the median performance across all facilities in program)	Performance Target (NOTE: target listed as an unweighted average across all facilities in program)	Notes
Data Format	Free text	Free text	Percentage (00.0%)	Percentage (00.0%)	Free text. If the State will deviate from the measure specification, please describe here. If the State is using a state-specific measure, please define the numerator and denominator here. In addition, describe any planned data or measure stratifications (for example, age, race, or ethnicity) the State will use to evaluate the payment arrangement.
Example	Flu Vaccinations for Adults Ages 19 - 64 (PVA-AD); NQF # 0039	CY 2019	34.0%	34.0%	
a.	Staffing Turnover ;	4/1/19-3/31/22	47.0%	43.5%	Performance target set as 10% gap closure from the program year 2 performance target, which was 45.2%, toward the high performance benchmark for this measure, which is 25.3%.
b.	Percent of Residents Who Lose Too Much Weight, Long Stay (CBE ID 0989) ;	7/1/20-6/30/23	5.2%	4.4%	Performance target set as 10% gap closure from the program year 2 performance target, which was 4.8%, toward the high performance benchmark for this measure, which is 1.2%.
c.	Percent of Residents Experiencing One or More Falls with Major Injury, Long Stay (CBE ID 0574) ;	7/1/21-6/30/22	1.3%	1.1%	Performance target set as 10% gap closure from the program year 2 performance target, which was 1.2%, toward the high performance benchmark for this measure, which is 0.2%.
d.	Percent of Residents Who Received an Antipsychotic Medication, Long Stay ;	7/1/19-6/30/22	7.8%	7.1%	Performance target set as 10% gap closure from the program year 2 performance target, which was 7.4%, toward the high performance benchmark for this measure, which is 4.3%.
	NOTE: a. indicates lower is better bBold indicates OIG priority measure				