

# **Skilled Nursing Facility (SNF) Workforce and Quality Incentive Program (WQIP)**

**Friday, May 29, 2026  
MCP Stakeholder Webinar**

# Introduction

- » In addition to the Microsoft Teams webinar, members of the public may call in to +1 279-895-6425 and enter phone conference ID: 874 375 903#.
- » Stakeholders can sign up for the AB 186 email ListServ at [this website](#).

# Introductions

- » Kate Bravo, Health Program Specialist II, Value-Based Payment (VBP) Branch
- » Kiran Singh, Incentive Programs Section Chief, VBP Branch

# Agenda

- » All Plan Letter (APL) Updates
- » APL New Requirements
- » APL Reminders
- » Payments & SNF Collaboration
- » SNF WQIP Sunsetting
- » Public Comment

# APL Updates

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- » [APL 26-006](#) was published on March 30, 2026.
  - APL 26-006 was disseminated to Medi-Cal Managed Care Plans (MCPs) on November 18, 2025, and public comment was due to DHCS by December 4, 2025.
- » [APL 25-002](#) (superseded by 26-006) was published on January 13, 2025.

# APL Updates & Reminders

## » **MCPs are responsible for the following:**

- For ensuring that all Subcontractors, Downstream Subcontractors, and Network Providers comply with state/federal laws, contract requirements, and DHCS guidance (including APLs and Policy Letters).
- Communicating these requirements to all delegated entities.
- Reviewing Network Provider and Subcontractor Agreements (including Division of Financial Responsibility sections) to ensure alignment with APL requirements.

## » DHCS may issue **Corrective Action Plans (CAPs)** or **monetary sanctions** for **non-compliance**.

- Additional information on sanctions is available in APL 23-012 and future updates.

## » **Failure to meet APL requirements** may result in a CAP and subsequent sanctions.

# **APL 26-006: New Requirements**

# Interest for Late Payment

- » **SNF WQIP payments are treated as part of a “claim”** under Health & Safety Code section 1371.
- » **For payment exhibits issued after March 30, 2026**, MCPs must pay **15% annual interest** on any unpaid SNF WQIP amounts.
- » Interest begins the **first calendar day after** the later of:
  - **45 calendar days** after the MCP receives the payment exhibits from DHCS, or
  - **45 working days** after receipt of claims (for claims received on or before Dec 31, 2025), or
  - **30 calendar days** after receipt of claims (for claims received on or after Jan 1, 2026).
- » **MCPs must automatically include all accrued interest** in any late payment—no provider request required.
- » These requirements **do not replace or reduce any other interest obligations** under APL 23-020 or applicable state/federal law.

# Publishing Requirements for SNF WQIP Bed Days & Payments

- » MCPs must publish each SNF WQIP-eligible Network Provider's **contracted bed days (by CY)** and **payment totals (by PY)** on an MCP-maintained public SNF WQIP website.
- » Data must be published for **all prior Calendar Years**.
- » For the **immediate prior CY**, MCPs must update data twice per year:
  - By **September 1**
  - By **February 15** (example: CY 2025 data posted by Sept 1, 2026; updated by Feb 15, 2027)
- » Each SNF must be listed **individually** with:
  - National Provider Identifier (NPI)
  - Health Care Access and Information (HCAI) ID
- » MCPs must use the **template Excel document** provided as an enclosure to the APL.
- » MCPs must **send the website URL** to the SNF WQIP Inbox ([SNFWQIP@dhcs.ca.gov](mailto:SNFWQIP@dhcs.ca.gov)) within **7 calendar days** of publishing the data.

# APL Reminders

# SNF WQIP – Network Provider Grievances

- » [APL 26-002](#) states that MCPs **must maintain a formal procedure** to accept, acknowledge, and resolve Network Provider grievances related to:
  - The processing or non-payment of SNF WQIP directed payments, and
  - The calculation of SNF WQIP qualifying bed days.
- » DHCS may request information on Network Provider grievances and how they were resolved.
- » **MCPs must maintain records** sufficient to respond to DHCS requests regarding Network Provider grievances.
- » The [Managed Care Boilerplate Contract](#) has direction on the Provider Dispute Resolution Mechanism (3.2.2 on page 172).
- » **Provider Dispute Resolution APL** is forthcoming.

# SNF WQIP – CDPH Citations & Payment Withholds

- » MCPs must withhold SNF WQIP payments for facilities with **Class AA or Class A citations** issued by CDPH for violations occurring wholly or partly in the PY.
  - **Class AA citations** (proximate cause of resident death):
    - Facility is **disqualified from all SNF WQIP payments** for that PY.
  - **Class A citations** (imminent danger or substantial probability of serious harm or death):
    - Facility receives a **40% penalty** to the per-diem payment for that PY.
- » MCPs and/or SNFs must monitor SNFs via the [State Enforcement Actions Dashboard](#), which CDPH publishes citation data.
- » **Instructions for how to drill down** the State Enforcement Actions Dashboards were disseminated to the [SNF WQIP MCP Contact List](#).
  - Email the SNF WQIP Inbox if you would like a copy of the instructions.
- » If an MCP learns of a citation after issuing any interim or final payment, the MCP must **recoup and withhold payments retroactively** for that PY.
- » For citations that are appealed, MCPs must withhold the applicable payments until **all appeals are exhausted**.
- » If applicable, MCPs must release the applicable payments based on the **final disposition** of the citation, without regard to the length of the appeals process

# CDPH Citations Timeline

CDPH **Class A or Class AA Citation** is issued

**SNF provides proof of clearance** and/or MCP obtains clearance via the CDPH Enforcement Dashboard

MCP must **withhold** SNF WQIP payments

**MCP has 45 days from date of clearance documentation** to release withheld funds

# SNF WQIP Public Internet Website

- » MCPs must communicate the **payment processes** to SNF WQIP-eligible Network Providers and **maintain a SNF WQIP public internet website**.
- » The communication and website must, at a **minimum**, include:
  - A description of how payments will be processed
  - How to file a Provider grievance
  - How to determine the responsible payer
  - A hyperlink to the [DHCS SNF WQIP website](#)

# Biannual Webinars for SNF WQIP Providers

- » MCPs must hold **two webinars per year** for all SNF WQIP-eligible Network Providers.
- » Webinars must allow virtual participation **by phone** and **optionally via online teleconference**.
- » Webinars must include the ability for providers to **ask live questions**.
- » MCPs covering multiple counties may hold **one combined webinar**.
- » Multiple MCPs in a county/region may hold **joint webinars**, but each MCP must answer questions related to its own operations.
- » MCPs must post webinar **date, time, and joining instructions** on their SNF WQIP public website **at least 30 days in advance** and notify DHCS and all eligible providers.
- » DHCS may provide additional guidance on webinar **timing, content, and duration**.

# MCP Point of Contacts for WQIP

- » Update MCP contacts on the [SNF WQIP MCP Contact List](#) by emailing the SNF WQIP Inbox.
- » Important that the MCP contacts listed in the MCP Contact List are staff that are **actively supporting** the SNF WQIP operations.
  - Some SNFs have reported that plans are not responsive when contacted numerous times.
- » DHCS recommends **alignment** between point of **SNF WQIP contact and LTSS liaison**.
- » **Refer to [APL 25-015](#) “MCP Communication”** for specific plan communication requirements.

# Payments & SNF Collaboration

# Bed Days Sharing & Reconciliation

- » The plans should be sharing their **internal data** to facilitate reconciliation with providers.
  - DHCS is only sharing bed day data with MCPs to show them what is being reflected in the DHCS data warehouse.
- » MCPs must send each SNF WQIP-eligible provider a summary-level report (Appendix A fields) within **30 calendar days** of receiving the DHCS data.
  - Reports must be provided in a manipulatable digital format.
- » If a provider identifies a **discrepancy**, the MCP must:
  - Confirm receipt within **3 business days**, and
  - **Work with the provider** to reconcile the data.
- » Reconciliation must include **member-level data and claims** in a machine-readable format, **upon provider request**.
- » **Importance of updating 274 files** (if necessary).
  - » Per [APL 16-019](#), MCPs are **already responsible** for submitting complete, accurate provider network information to DHCS.
  - » MCPs are responsible **for identifying WQIP qualifying days**, so MCPs are responsible for paying on days for contracted facilities, **regardless of what shows on the 274 file**.
  - » **Providers cannot be penalized** due to inaccuracies in the MCP's 274 file (e.g. missing or inaccurate NPIs).

# Bed Day & Payment Reconciliation

- » MCPs must **calculate all qualifying SNF WQIP bed days** and pay the directed per-diem rate for all clean and complete bed days, **regardless of when they are reported.**
- » MCPs must **net out** any previously issued interim payments when issuing the final payment.
- » **Payments to SNF WQIP-eligible Network Providers** must be made within (whichever is later):
  - **45 calendar days** of receiving DHCS payment exhibits, or
  - **30 calendar days** of receiving a Clean Claim
- » **Failure to meet APL requirements** will result in late interest and may result in a CAP and subsequent sanctions.

# Qualifying Bed Days

- » DHCS has **not** specified which specific **revenue codes** qualify for the SNF WQIP.
- » Below is the definition from the [DHCS SNF WQIP CY 2025 Technical Assistance Guide](#) for an eligible day (**pages 5-6**).
  - **SNF WQIP-Qualifying Bed Days**

“Freestanding SNF Level-B bed days that are rendered by a network provider during the program year and reimbursed by a MCP where Medi-Cal is the primary payer are eligible to earn WQIP payments. Bed days reimbursed outside of a network agreement, days where Medi-Cal is a secondary payer, and bed days reimbursed through the Medi-Cal Fee-For-Service (FFS) Delivery System are not eligible for WQIP payments. Freestanding pediatric subacute care facilities, distinct part facilities, and SNFs with 100 percent designated special treatment program (STP) beds are not eligible for WQIP payments.”
- » Thus, there is **no carve out** in the technical guide to disallow skilled nursing days.

# SNF WQIP IMD Payment Requirements & Age-Based Eligibility

## » SNF WQIP – IMD Payment Requirements:

- MCPs must cover **room & board** in IMD-designated SNFs only for members **age 65+**.
- Bed days for members **under age 65** cannot count toward SNF WQIP and **must be reimbursed**.
- MCPs must reimburse allowable services (including room & board) for members **65+**, and those bed days may count if not disqualified for other reasons under APL 26-006.

## » Compliance Expectations:

- MCPs must review **past and current claims** to ensure IMD SNF payments are **limited** to members age **65+**.
- Any SNF WQIP payments for members **under age 65 are overpayments** and must be corrected through the standard process within **45 business days**.

# SNF WQIP Sunsetting

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- » The **last measurement year in the SNF WQIP was CY 2025 (PY3)**; thus, payments will be made in CY 2026.
- » Please note that **2026 will be the last CY for which payments will be made** in the SNF WQIP due to the program's sunsetting.

# Closing

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- » **For MCPs that have any questions regarding this APL**, please contact your MCOD Contract Manager and Capitated Rates Development Division Liaison.
- » **For general SNF WQIP questions or feedback**, please email the [SNFWQIP@dhcs.ca.gov](mailto:SNFWQIP@dhcs.ca.gov).

# Public Comment

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- » DHCS welcomes public comment. DHCS staff may briefly respond to requests for clarification on this presentation.
- » Speakers are requested to introduce themselves and their organization.
- » Audience members are muted until they are called on by the moderator. Please use the “raise hand” button in Microsoft Teams to be added to the speaker queue. Once you are called on, you must unmute yourself in Microsoft Teams. If you are calling in, please press \*5 to raise your hand.
- » Please provide any written questions or feedback to:
  - The SNF WQIP Inbox at [SNFWQIP@dhcs.ca.gov](mailto:SNFWQIP@dhcs.ca.gov)