

December 6, 2024

*THIS LETTER SENT VIA EMAIL*

Les Ybarra, Medicaid Chief Executive Officer  
Anthem Blue Cross Partnership Plan  
21215 Burbank Boulevard  
Woodland Hills, CA 91367

**NOTICE OF IMPOSITION OF MONETARY SANCTIONS FOR FAILURE TO MEET OR EXCEED MINIMUM PERFORMANCE LEVELS FOR MEDI-CAL MANAGED CARE ACCOUNTABILITY SET PERFORMANCE MEASURES**

Dear Les Ybarra,

The Department of Health Care Services (DHCS) sends this Notice of Imposition of Monetary Sanctions Letter on Anthem Blue Cross Partnership Plan for failure to meet or exceed required minimum performance levels (MPLs) for measurement year 2023 (MY23)<sup>2</sup> Medi-Cal Managed Care Accountability Set (MCAS) performance measures (Exhibit A, Attachment 3, Quality Improvement System, section 2.2 External Quality Review Requirements).

On September 5, 2024, DHCS received validated MCAS measure rates from the External Quality Review Organization and confirmed that Anthem Blue Cross Partnership Plan has 106 plan-wide measures below MPL across 3 domain(s) for MY23 (see Table 2 for enforcement tier designation triggers).

Anthem Blue Cross Partnership Plan did not request a meet and confer conference with DHCS within two business days after the effective date of the Notice of Intent to Impose Monetary Sanctions Letter that was sent on October 25, 2024. This Notice of Imposition of Monetary Sanctions Letter supersedes the Notice of Intent to Impose Monetary Sanctions Letter and is made in accordance with W&I section 14197.7(g) and with the Quality Sanction Bulletin issued October 17, 2024. DHCS is imposing monetary sanctions for Anthem Blue Cross Partnership Plan's failure to comply with its obligations set forth in the Medi-Cal managed care plan (MCP) contract. Under W&I section

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<sup>2</sup> Measurement Year 2023 (MY 2023) covered activities conducted from January 1, 2023, to December 31, 2023.



14197.7(f) and the MCP contract, DHCS is authorized to impose a \$25,000 sanction per violation of Anthem Blue Cross Partnership Plan’s contractual obligation to meet or exceed MPLs for each MCAS performance measure (Exhibit A, Attachment 3, Quality Improvement System, section 2.2 External Quality Review Requirements).

**The total sanction amount for Anthem Blue Cross Partnership Plan is \$819,000 for the following 106 measures below the MPL for MY23:**

Quality Reporting Unit	Measures*	Domains*	MCP Rates	MPL	TRENDING Difference from HEDIS MY 2022	Population Impacted
Alameda	LSC	CH	55.47%	62.79%	2.67	350
	TFL-CH	CH	7.32%	19.30%	-0.43	20,986
	W30-2	CH	61.65%	66.76%	-5.28	293
	W30-6	CH	56.21%	58.38%	-3.12	127
	WCV	CH	41.03%	48.07%	-3.04	13,160
	AMR	CD	64.10%	65.61%	-11.01	135
	CBP	CD	57.66%	61.31%	7.3	1,376
	BCS	RC	39.67%	52.60%	-2.7	1,994
	CCS	RC	44.53%	57.11%	-3.89	9,462
Contra Costa	LSC	CH	38.20%	62.79%	-0.97	257
	TFL-CH	CH	6.14%	19.30%	-1.84	13,262
	W30-2	CH	60.54%	66.76%	-3.14	174
	W30-6	CH	56.06%	58.38%	1.58	58
	WCV	CH	41.48%	48.07%	-3.17	8,227
	AMR	CD	63.01%	65.61%	-14.31	91
	CBP	CD	57.42%	61.31%	-0.73	439
	BCS	RC	39.64%	52.60%	-3.32	769
	CCS	RC	44.77%	57.11%	-7.05	3,755
Fresno	CIS-10	CH	23.66%	30.90%	-7.73	2,001
	DEV	CH	24.14%	34.70%	-7.43	4,740
	LSC	CH	48.90%	62.79%	-2.92	1,346
	TFL-CH	CH	16.90%	19.30%	5.06	43,792
	W30-2	CH	62.56%	66.76%	1.25	937
	W30-6	CH	42.59%	58.38%	-2.44	686
	WCV	CH	45.22%	48.07%	-0.42	27,777
	AMR	CD	60.89%	65.61%	-7.61	433

	HBD	CD	46.47%	37.96%	7.78	4,376
	BCS	RC	47.66%	52.60%	0.53	3,135
	CCS	RC	53.04%	57.11%	-1.95	13,809
	PPC-PRE	RC	80.29%	84.23%	-7.54	355
	PPC-PST	RC	73.48%	78.10%	-3.41	477
Kings	CIS-10	CH	21.65%	30.90%	-2.68	354
	DEV	CH	3.40%	34.70%	0.17	1,108
	IMA-2	CH	28.47%	34.31%	-2.45	373
	LSC	CH	52.55%	62.79%	2.91	214
	TFL-CH	CH	7.57%	19.30%	1.63	9,245
	W30-2	CH	55.04%	66.76%	-0.93	205
	W30-6	CH	48.76%	58.38%	-5.63	103
	WCV	CH	40.27%	48.07%	0.92	5,744
Madera	W30-6	CH	42.00%	58.38%	-4	116
	HBD	CD	43.80%	37.96%	-5.11	735
	BCS	RC	48.63%	52.60%	-6.76	543
	PPC-PRE	RC	82.40%	84.23%	-5.77	66
Region 1	CIS-10	CH	21.08%	30.90%	-8.85	745
	DEV	CH	29.88%	34.70%	-5.79	1,678
	IMA-2	CH	28.71%	34.31%	-0.97	1,022
	LSC	CH	50.26%	62.79%	-2.78	472
	TFL-CH	CH	14.94%	19.30%	-0.98	21,919
	W30-6	CH	50.27%	58.38%	1.17	186
	WCV	CH	46.68%	48.07%	1.19	13,484
	BCS	RC	47.45%	52.60%	4.1	1,873
	CCS	RC	49.64%	57.11%	0.25	7,182
	CHL	RC	48.51%	56.04%	-1.15	1,141
	PPC-PRE	RC	83.16%	84.23%	-6.44	119
Region 2	CIS-10	CH	21.65%	30.90%	-1.95	1,343
	DEV	CH	26.78%	34.70%	-6.33	3,046
	IMA-2	CH	29.93%	34.31%	1.46	1,502
	LSC	CH	44.83%	62.79%	-0.18	949
	TFL-CH	CH	10.85%	19.30%	0.09	35,905
	W30-2	CH	59.27%	66.76%	-2.65	681
	W30-6	CH	48.47%	58.38%	-1.21	320
	WCV	CH	38.18%	48.07%	-1.61	24,203
	CBP	CD	59.12%	61.31%	-1.71	1,934

**Quality & Population Health Management**

1501 Capitol Avenue, MS 0020  
P.O. Box 997413

Sacramento, CA 95899-7413

Phone (916) 449-7400 | [www.dhcs.ca.gov](http://www.dhcs.ca.gov)

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	BCS	RC	45.91%	52.60%	0.87	2,852
	CCS	RC	48.42%	57.11%	-7.05	12,309
	CHL	RC	50.66%	56.04%	3.35	1,574
	PPC-PRE	RC	83.33%	84.23%	-1.1	199
Sacramento	CIS-10	CH	23.11%	30.90%	-2.68	2,605
	DEV	CH	33.41%	34.70%	-6.39	5,779
	LSC	CH	47.29%	62.79%	1.42	1,791
	TFL-CH	CH	13.12%	19.30%	1.75	66,234
	W30-2	CH	60.30%	66.76%	-2.49	1,280
	W30-6	CH	44.76%	58.38%	-5.57	997
	WCV	CH	43.90%	48.07%	-6.96	41,294
	AMR	CD	62.05%	65.61%	-6.25	564
	CBP	CD	54.26%	61.31%	2.68	5,018
	BCS	RC	43.84%	52.60%	-0.42	6,458
	CCS	RC	50.36%	57.11%	-6.75	24,060
	PPC-PST	RC	74.31%	78.10%	-4.52	793
San Benito	CIS-10	CH	28.04%	30.90%	0.02	195
	DEV	CH	4.55%	34.70%	-14.93	587
	LSC	CH	57.20%	62.79%	-11.77	116
	TFL-CH	CH	5.31%	19.30%	-0.28	4,479
	W30-2	CH	64.44%	66.76%	-4.95	80
	W30-6	CH	40.00%	58.38%	-16.56	57
	WCV	CH	44.85%	48.07%	-3.5	2,443
San Francisco	DEV	CH	32.25%	34.70%	11.33	271
	LSC	CH	60.38%	62.79%	-9.91	63
	TFL-CH	CH	14.23%	19.30%	6.19	3,725
	W30-2	CH	64.63%	66.76%	5.73	52
	W30-6	CH	53.41%	58.38%	4.09	41
	WCV	CH	43.42%	48.07%	1.75	2,417
	AMR	CD	56.86%	65.61%	5.95	44
	CCS	RC	46.23%	57.11%	-0.24	2,952
Santa Clara	LSC	CH	60.58%	62.79%	-1.22	386
	TFL-CH	CH	14.31%	19.30%	4.79	21,112
	W30-2	CH	63.62%	66.76%	-3.85	326
	W30-6	CH	39.40%	58.38%	-6.28	346
	WCV	CH	41.93%	48.07%	-0.94	13,943
	AMR	CD	63.76%	65.61%	-0.2	108



	CBP	CD	58.88%	61.31%	8.27	1,547
	BCS	RC	43.23%	52.60%	-3.74	2,340
	CCS	RC	48.42%	57.11%	-1.94	8,147
Tulare	DEV	CH	7.74%	34.70%	0.71	5,480
	TFL-CH	CH	13.93%	19.30%	5.7	45,729
	W30-2	CH	65.87%	66.76%	-0.1	784

\*Please see Table 1 for acronym definitions

Successful administration of the Medi-Cal program requires a collaborative partnership between DHCS and MCPs. This collaboration includes the expectation that MCPs will meet or exceed their contractual and programmatic requirements on an ongoing basis. Anthem Blue Cross Partnership Plan and DHCS regularly collaborated on strategies for improving the Plan’s MCAS performance measures required to meet or exceed MPLs (Exhibit A, Attachment 3, Quality Improvement System, section 2.2 External Quality Review Requirements).

As noted above, DHCS is authorized to impose sanctions for failure to meet or exceed MPLs for each MCAS performance measure. Anthem Blue Cross Partnership Plan confirming failure to meet or exceed the MPLs as outlined in the contract creates good cause for DHCS to impose monetary sanctions (Exhibit A, Attachment 3, Quality Improvement System, section 2.2 External Quality Review Requirements; Exhibit E, Program Terms and Conditions, section 1.1.19 Sanctions; W&I § 14197.7(e)).

Pursuant to W&I section 14197.7 and in accordance with APL 23-012, DHCS has considered the factors set forth in W&I section 14197.7(f) and (g) in determining the sanction amount, including the following:

- Scope of the violations, which are determined by the number of eligible members impacted by the quality-of-care violation (e.g., the number of eligible members who did not receive the recommended preventive service).
- In determining the nature, scope, and gravity of the violation under W&I section 14197.7(g)(1), DHCS will consider the degree to which the MCP is below the MPL for the measure at issue and will increase sanction amounts per violation based upon the severity of the violation (see Table 3 for violation factors).
- DHCS will consider whether the MCP’s performance on the MPL at issue has improved or worsened over the previous MY under W&I section 14197.7(g)(6). If performance has worsened over the previous MY, the





Les Ybarra, CEO  
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Sincerely,

Sarah Lahidji  
Division Chief, Quality and Health Equity  
Quality and Population Health Management  
Department of Health Care Services

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Signed by:

*Sarah Lahidji*

DocuSign Envelope ID: 3993E8A6-B6D9-4AFE-B525-5D61CA690820

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ACH/Wire to:

Beneficiary Account Name: Department of Health Care Services

Bank Name: US Bank  
Laurel Heights Branch  
3471 California St San Francisco, CA 94118

Routing Number: 122235821  
Bank Account Number: 1-583-0005-7623  
Reference: Sanction or any identifier

For Check Payment:

Payable to: Department of Health Care Services

Cash Receipts Unit  
1501 Capitol Avenue MS 1101  
PO Box 997415  
Sacramento, CA 95899-7415

For check payment, please include the Notice of Imposition of Monetary Sanctions Letter and any backup documents that will identify the payment.



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CC

Michelle Baass  
Director  
Department of Health Care Services

Tyler Sadwith  
State Medicaid Director  
Department of Health Care Services

Sarah Brooks  
Chief Deputy Director, Health Care Programs  
Department of Health Care Services

Lindy Harrington  
Assistant State Medicaid Director  
Department of Health Care Services

Palav Babaria  
Deputy Director, Chief Quality Officer  
Quality and Population Health Management  
Department of Health Care Services

Judith Recchio  
Deputy Director and Chief Counsel  
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Susan Philip  
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Assistant Deputy Director, Managed Care  
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Michelle Retke  
Contracting Officer, Chief of Managed Care Operating Division  
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Dana Durham  
Chief of Managed Care Quality and Monitoring Division  
Health Care Delivery Systems  
Department of Health Care Services

Dr. Rafael Gonzalez-Amezcuca, Manager Medical Director  
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21215 Burbank Boulevard  
Woodland Hills, CA 91367

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Enclosure

<b>TABLE 1: DOMAIN, MEASURE, &amp; ACRONYM</b>		
<b>Domain</b>	<b>Measure</b>	<b>Acronym</b>
<b>Children’s Health (CH)</b>	Child and Adolescent Well-Care Visits	WCV
	Childhood Immunization Status: Combination 10	CIS-10
	Developmental Screening in the First Three Years of Life	DEV
	Immunizations for Adolescents: Combination 2	IMA-2
	Lead Screening in Children	LSC
	Topical Fluoride for Children	TFL-CH
	Well-Child Visits in the First 30 Months of Life – 0 to 15 Months – Six or More Well-Child Visits*	W30-6+
	Well-Child Visits in the First 30 Months of Life – 15 to 30 Months – Two or More Well-Child Visits*	W30-2+
<b>Reproductive Health and Cancer Prevention (RC)</b>	Chlamydia Screening in Women	CHL
	Prenatal and Postpartum Care: Postpartum Care	PPC-Post
	Prenatal and Postpartum Care: Timeliness of Prenatal Care	PPC-Pre
	Breast Cancer Screening	BCS-E
	Cervical Cancer Screening	CCS
<b>Chronic Disease Management (CD)</b>	Asthma Medication Ratio	AMR
	Controlling High Blood Pressure	CBP
	Comprehensive Diabetes Care: HbA1c Poor Control (>9.0%)*	HBD-H9*

\*A lower rate is better for this measure



<b>TABLE 2: QUALITY ENFORCEMENT TIER DESIGNATION TRIGGERS</b>			
<b>Enforcement Tiers</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
<b>Triggers</b>	One (1) measure below the MPL in any one (1) domain	Two (2) or more measures below the MPL in any one (1) domain	Three (3) or more measures below the MPL in two (2) or more domains
<b>Enforcement Action</b>	Not subject to monetary sanction	Subject to monetary sanction	Subject to monetary sanction

<b>TABLE 3: VIOLATION AND BENEFICIARY IMPACT (W&amp;I section 14197.7(g)(1))</b>		
<b>Severity/Beneficiary Impact</b>	<b>Violation per Measure</b>	<b>Severity Violation Factor</b>
Slight Violation	<1.00% below MPL	1.0
Minimal Violation	1.00% - 2.99% below MPL	1.1
Minor Violation	3.00% - 5.99% below MPL	1.2
Moderate Violation	6.00% - 10.99%	1.4
Moderately Severe Violation	11.00% - 15.99%	1.6
Severe Violation	16.00% - 20.99%	1.8
Extremely Severe Violation	≥21.00% below the MPL	2.0

<b>TABLE 4: TRENDING FACTOR (W&amp;I section 14197.7(g)(6))</b>		
<b>Degrees of Improvement</b>	<b>Trending Difference per Measure</b>	<b>Trending Factor</b>
Significant Worsening	>(-)15.01%	2.0
Moderately Significant Worsening	(-)15.00% - (-)11.01%	1.8
Moderate Worsening	(-)11.00% - (-)7.01%	1.6
Minimal Worsening	(-)7.00% - (-) 4.01%	1.4
Slight Worsening	(-)4.00% - (-) 0.01%	1.2
No Improvement	0.00 – 1.00%	1.0
Slight Improvement	1.01% - 4.00%	0.8
Minimal Improvement	4.01% - 7.00%	0.6
Moderate Improvement	7.01% - 11.00%	0.4
Moderately Significant Improvement	11.01% - 15.00%	0.2
Significant Improvement	≥15.01%	0.0



<b>TABLE 5: HPI IMPACT AND SANCTION REDUCTION</b>		
<b>Severity (Impact) of HPI (per county and MCP)</b>	<b>HPI Percentile</b>	<b>HPI Impact Factor (Sanction Reduction)</b>
Very High	0-9%ile	50%
High	10-19%ile	40%
Moderate	20-29%ile	30%
Low Moderate	30-39%ile	20%
Low	40-49%ile	10%



**NOTICE OF APPEAL RIGHTS**

Anthem Blue Cross Partnership Plan has the right to request a hearing in connection with any sanctions within fifteen (15) working days after the “effective date” of the sanctions letter. DHCS will stay the imposition of sanctions upon receipt of the request for a hearing until the effective date of a final decision from the Office of Administrative Hearings and Appeals (OAHA). Anthem Blue Cross Partnership Plan may request a hearing by sending a letter so stating to the Office of Administrative Hearings and Appeals at the address below:

Chief Administrative Law Judge  
Office of Administrative Hearings and Appeals  
Department of Health Care Services  
3831 N. Freeway Blvd., Suite 200  
Sacramento, CA 95834

A copy of the hearing request must also be sent to:

Thomas Mahoney  
Quality and Health Equity Measurement Monitoring Section Chief  
Quality and Population Health Management  
Department of Health Care Services  
MS 0020  
P.O. Box 997413  
Sacramento CA 95899-7413

Judith Recchio  
Deputy Director and Chief Counsel  
Office of Legal Services  
Department of Health Care Services  
MS 0010  
P.O. Box 997413  
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