

September 11, 2023

CCS Information Notice: 23-03

TO: All County California Services (CCS) Program Administrators, Medical Consultants, Integrated Systems of Care Division Staff

SUBJECT: Whole Child Model (WCM) – Assembly Bill 2724 Implementation

The purpose of this Information Notice is to inform impacted WCM counties of the requirements outlined in Assembly Bill (AB) 2724.¹ The Department of Health Care Services (DHCS) will release an updated WCM Numbered Letter and All Plan Letter with guidance on the implementation of AB 2724.

On June 30, 2022, Governor Gavin Newsom signed into law AB 2724 (Chapter 73, Statutes of 2022) that authorizes DHCS to contract with alternative health care service plans (AHCSP) in select WCM counties. Effective January 1, 2024, DHCS will implement direct contracts with Kaiser Permanente as an AHCSP in the following WCM counties: Marin, Napa, Orange, San Mateo, Santa Cruz, Solano, Sonoma, and Yolo

Kaiser's Responsibilities:

No sooner than January 1, 2024, current WCM members in the above counties may actively choose to enroll into Kaiser Permanente, subject to meeting eligibility criteria. WCM members enrolled with Kaiser Permanente under subcontract arrangement (all counties listed above except Santa Cruz) in 2023 will maintain their enrollment with Kaiser as it transitions to a prime managed care plan (direct contract with DHCS). Kaiser Permanente will enter into a memorandum of understanding with DHCS to outline the responsibilities of each party under the implementation of AB 2724.

Kaiser Permanente will be held to the same CCS and WCM standards as all other WCM Medi-Cal managed care health plans (MCP) including but not limited to: All Plan Letters, Numbered Letters, CCS Program Administrative Case Management Manual, and any other DHCS guidance. DHCS will conduct county readiness activities listed in the Kaiser County Readiness document that will be distributed to the counties prior to the transition, and post-transitional monitoring to ensure the transition of Kaiser Permanente as a WCM MCP meets all state and federal Medi-Cal, CCS, and WCM standards.

¹ [AB 2724](#)

CCS Information Notice: 23-03
WCM – AB 2724 Implementation
September 11, 2023

Under the WCM, Kaiser Permanente will assume full financial responsibility for authorization and payment of CCS eligible medical services, including service authorization activities, claims, and case management.

Kaiser Permanente will be required to contract with CCS-paneled providers and DHCS-approved Special Care Centers to meet network adequacy requirements. DHCS will conduct a network adequacy assessment on Kaiser Permanente's provider networks to ensure the plan meets all network adequacy requirements and is able to provide the medically necessary care to all its WCM members.

County Responsibilities:

Counties will maintain responsibility for CCS program eligibility determinations for potential members, including responding to and tracking appeals relating to eligibility determinations. Counties will develop processes to provide Kaiser Permanente with financial and residential eligibility information.

Counties will continue to provide care coordination services for CCS children not included in the WCM. This includes children who do not have full scope Medi-Cal, children with other health coverage, and children who receive Medical Therapy Program (MTP) services. Counties will be responsible for coordinating care with MCPs for members accessing care through both the County and health plan delivery systems.

DHCS is facilitating ongoing meetings between impacted counties and Kaiser Permanente as part of the implementation of Kaiser Permanente as a WCM MCP. Additionally, Kaiser Permanente is also mandated to hold periodic Family Advisory Committee meetings with counties and local external stakeholders.

DHCS looks forward to working with the WCM counties and Kaiser Permanente on the implementation of AB 2724 and improving the delivery of CCS services in WCM counties. If you have any questions regarding AB 2724, please send your inquiries by email to CCSProgram@dhcs.ca.gov.

Sincerely,

ORIGINAL SIGNED BY

Cortney Maslyn, Chief
Integrated Systems of Care Division
Department of Health Care Services