



**HEALTHY FAMILIES PROGRAM
TRANSITION TO MEDI-CAL**

**NETWORK ADEQUACY ASSESSMENT REPORT
ADDENDUM TO PHASE 3**

July 2, 2013

**Submitted by the California Department of Managed Health Care and
the Department of Health Care Services**

**HEALTHY FAMILIES PROGRAM TRANSITION TO MEDI-CAL
NETWORK ASSESSMENT –ADDENDUM TO PHASE 3**

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PHASE 3 HEALTHY FAMILIES TRANSITION TO MEDI-CAL NETWORK ASSESSMENT

ADDENDUM

I. Introduction

On May 1, 2013, the Department of Health Care Services (DHCS) and the Department of Managed Health Care (DMHC) (hereinafter “the departments”) presented the “Healthy Families Program Transition to Medi-Cal – Network Adequacy Assessment Report – Phase 3” (hereinafter “Phase 3 Assessment”) to the state Legislature. This Addendum provides new information from the Phase 3 Medi-Cal plans related to concerns identified in the Phase 3 Assessment. The plans responded to the departments’ concerns involving geographic access, provider overlap, provider capacity, and health plan subcontracts with Kaiser Foundation Health Plan. The departments describe the follow-up questions sent to the plans, a summary of the plans’ responses, and the departments’ assessment of those responses.

II. Health Plan Responses to Departmental Follow-Up Inquiries

As described in the Phase 3 Assessment, the departments identified areas requiring follow-up information from certain health plans. For each plan listed below, the departments have repeated the inquiry posed to the health plan, summarized the health plan response, and provided their assessment of the plan’s response.

Anthem Blue Cross

Sacramento County

Inquiry: According to data submitted for the Phase 3 transition, it appears that 54% of the Plan’s contracted Medi-Cal PCPs are accepting new Medi-Cal patients in Sacramento County. Please confirm whether this number conforms to the Plan’s data regarding the percentage of PCPs who are accepting new patients. If it does not conform, please provide updated PCP network sheets identifying the PCPs who are accepting new patients. If it does conform to the Plan’s data, please explain what steps the Plan is taking to ensure that an appropriate number of PCPs are available to accept transitioning Phase 3 HFP enrollees.

- **Plan Response:** The Plan verified that the percentage of PCPs accepting new patients provided in the Phase 3 Report conforms to the Plan’s information. The Plan estimates it will be receiving approximately 25-30 enrollees of the 115 HFP enrollees transitioning into Medi-Cal from the Phase 3 HFP plan in Sacramento County. Based on the small number of enrollees expected to transition into the Plan, the Plan believes it has an appropriate number of PCPs accepting new patients to provide care for the transitioning Phase 3 population in Sacramento County. The Plan indicates

that if an enrollee's current PCP is in the Plan's network but is not accepting new patients, the Plan's Customer Care Associates will work with that provider to see if the enrollee can be assigned to that provider in light of the enrollee's existing relationship with the provider. The Plan states that, under most circumstances, PCPs will allow the Plan to re-assign the PCP's existing patients after a change in health plan, even if the PCP is no longer accepting new patients from that plan.

- **Assessment:** Based on the small number of enrollees expected to transition into Sacramento County Medi-Cal in Phase 3, it appears that the Plan has ample PCPs who are accepting new patients to accommodate the transitioning HFP enrollees. The Plan's response does not account for the new Medi-Cal members who would otherwise have qualified for HFP but will now be coming into the Medi-Cal program; however, because there are three other plans available to Medi-Cal enrollees in Sacramento County, new members are still likely to have adequate overall access to care in Sacramento County. All other Medi-Cal health plans operating in Sacramento County indicated that at least 74% of their PCPs were accepting new patients. Furthermore, the Department of Health Care Services has worked with Health Plan of San Joaquin to ensure members will continue to be assigned to HPSJ, until the member chooses otherwise, so it is not anticipated that a large number of Phase 3 HFP enrollees will be transitioning into the Sacramento County Medi-Cal health plans. Additionally, the Phase 3 Report identified Medi-Cal PCPs who are accepting new patients in every city in the county that previously offered HFP PCPs. Any transitioning HFP enrollees who may have to change PCPs should be able to access care with a new Medi-Cal PCP in the city where they were previously receiving primary care.

Inquiry: In the Plan's Phase 3 network data, the Plan identified a number of clinics as PCPs in its PCP provider network. Please complete the attached template identifying the individual physicians that are associated with each contracting clinic.

- **Plan Response:** The Plan submitted data identifying the individual providers that operate out of the Sacramento clinics that are contracted with the Plan's Medi-Cal network. None of these providers are currently contracted with the Sacramento County Phase 3 HFP health plan, Health Plan of San Joaquin (HPSJ).
- **Assessment:** Overall, 13% of Phase 3 HFP PCPs (i.e. PCPs contracted with Health Plan of San Joaquin for Sacramento County) are available in the Sacramento County Medi-Cal managed care network. The data from the Plan indicate that this percentage does not change when individual providers associated with contracted clinics are added to the equation. While the lower rate of overlap between the networks could implicate continuity of care for transitioning Phase 3 HFP enrollees, the Department of Health Care Services has worked with the Phase 3 Sacramento County HFP plan, HPSJ, and have arranged for HPSJ to continue providing services to the Sacramento

County Phase 3 HFP enrollees after the transition. Phase 3 HFP enrollees will continue to be assigned to HPSJ until the enrollee chooses otherwise; therefore, it is not anticipated that a large number of Phase 3 HFP enrollees will be transitioning into the Sacramento County Medi-Cal health plans. Furthermore, the Medi-Cal managed care networks in Sacramento County overall appear to have adequate capacity and PCP availability to provide new PCPs for any HFP enrollee who may have to change PCPs as a result of the transition.

CalViva Health Plan

Inquiry: In the Plan's Phase 3 network data, the Plan indicated that it was in the process of entering into a contract with Kaiser Foundation Health Plan in Fresno, Kings, and Madera Counties. Please provide information as to the status of that contract, including the expected date of execution. If the contract has already been executed, please indicate the date on which the contract was executed. If the proposed contract is not going forward or is unlikely to be executed prior to the Phase 3 transition (August 1, 2013), please describe what steps the Plan is taking to ensure continuity of care for Phase 3 HFP enrollees who are currently participating in Kaiser Foundation Health Plan in Fresno, Kings and Madera Counties when the enrollees transition into Medi-Cal.

- **Plan Response:** The Plan states that, as of June 7, 2013, the Plan is in final negotiations with Kaiser Foundation Health Plan and expects to execute the contract in June 2013. The contract will be effective on July 1, 2013.
- **Assessment:** Based on the Plan's response, it appears that the Plan has made progress in its contracting efforts with Kaiser and that a contract is highly likely to be executed by July. If the Plan executes a subcontract with Kaiser, all HFP enrollees in Fresno, Kings, and Madera counties who are currently enrolled in Kaiser's HFP product will be able to stay in the Kaiser network post-transition to Medi-Cal. The departments will continue to monitor the progress of this contract and will take additional steps to review the adequacy of the CalViva networks in Fresno, Kings, and Madera counties if the Plan does not ultimately enter into a contract with Kaiser for these regions.

CenCal Health Plan

San Luis Obispo County

Inquiry: In the Plan's Phase 3 network data, the Plan identified a number of clinics as PCPs in its PCP provider network. Please complete the attached template identifying the individual physicians that are associated with each contracting clinic for San Luis Obispo County.

- **Plan Response:** The Plan provided a list of all individual providers who serve patients via the Plan's contracted clinics. The departments compared the provider information against the HFP provider network in that region and found that 67% of the providers

- contracted with the Phase 3 HFP plan in that county are also available in CenCal Health Plan's Medi-Cal network. When the overlap in networks is compared against the HFP enrollee provider assignments, it appears that 81% of transitioning Phase 3 HFP enrollees will be able to continue seeing their PCP upon transition to Medi-Cal.
- **Assessment:** The new data indicates that there is a moderately high percentage of overlap between the Phase 3 HFP network and the Medi-Cal network and that a large percentage of enrollees will be able to continue seeing their treating PCP. Based on this new data, the departments have identified that the original overlap percentage reported in the Phase 3 Report (3%) was inaccurate. The new data indicates that the transition is unlikely to create any major disruptions in continuity of primary care.

Central California Alliance for Health

Merced County

Inquiry: According to data submitted for the Phase 3 transition, it appears that 67% of the Plan's contracted Medi-Cal individual PCPs and clinics are accepting new Medi-Cal patients in Merced County. Please confirm whether this number conforms to the Plan's data regarding the percentage of PCPs who are accepting new patients. If it does not conform, please provide updated PCP network sheets identifying the PCPs who are accepting new patients. If it does conform to the Plan's data, please explain what steps the Plan is taking to ensure that an appropriate number of PCPs are available to accept transitioning Phase 3 HFP enrollees.

- **Plan Response:** The Plan verified that the percentage of PCPs accepting new patients provided in the Phase 3 Report conforms to the Plan's information. The Plan has open capacity within its current Medi-Cal network to accommodate over 53,000 new enrollees, and estimates it will be receiving approximately 8,000 HFP enrollees transitioning into Medi-Cal in Merced County. Therefore, the Plan believes it has an appropriate number of PCPs accepting new patients to provide care for the transitioning Phase 3 population in Merced County. The Plan indicates that it has also contacted its contracted PCPs to confirm their intent to keep any current HFP enrollees when they transition into Medi-Cal. The Plan also continues to pursue contracts with non-contracted PCPs in Merced County.
- **Assessment:** Based on the Plan's capacity to accommodate over 53,000 new enrollees, it appears that the Plan has ample PCPs who are accepting new patients to serve the transitioning HFP enrollees. Plan data also indicate that there are Medi-Cal PCPs accepting new patients in all Merced County cities that previously offered HFP PCPs and all PCPs and clinics are under their Medi-Cal assignment capacity. Based on this information, it appears that the Medi-Cal network in Merced County has adequate capacity to serve enrollees in the Phase 3 transition, including those who may have to select a new PCP.

Inquiry: In the Plan's Phase 3 network data, the Plan identified a number of clinics as PCPs in its PCP provider network. Please complete the attached template identifying the

individual physicians that are associated with each contracting clinic.

- Plan Response: The Plan provided a list of all individual providers who serve patients via the Plan's contracted clinics. The departments compared the provider information against the HFP provider network in that region and found that 50% of the providers contracted with the Phase 3 HFP plan in that county are also available in Central California Alliance for Health's Medi-Cal network. When the overlap in networks is compared against the HFP enrollee provider assignments, it appears that 68% of transitioning Phase 3 HFP enrollees will be able to continue seeing their PCP upon transition to Medi-Cal.
- Assessment: The new data indicate that there is a moderate level of overlap between the Phase 3 HFP network and the Medi-Cal network and that a moderately high percentage of enrollees will be able to continue seeing their treating PCP post-transition. Based on this new data, the departments have identified that the original overlap percentage reported in the Phase 3 Report (6%) was inaccurate. The new data indicate that the transition is unlikely to create any major disruptions in continuity of primary care.

Inquiry: Data submitted by the HFP plan operating in Merced County indicated that the plan's HFP enrollees had access to a greater number of specialists than are available in the Central California Alliance for Health network. Please explain how the Plan will identify those specialists who were treating HFP enrollees and how the Plan will ensure continuity of care for transitioning HFP enrollees who were being treated by a specialist who is not in the Plan's contracted network.

- Plan Response: The Plan does not anticipate a disruption in specialty services to enrollees transitioning to Medi-Cal. The Plan maintains an open specialty care network within its service area, which requires PCP referral to access specialty care. Transitioning enrollees that have been receiving care from non-contracted specialists will be able to continue to receive services from that specialist in accordance with their Continuity of Care policy.
- Assessment: The data provided in the Phase 3 Report indicate that the Medi-Cal specialist network contains most of the same specialty types that were available and utilized under HFP, so the Medi-Cal network appears to have the appropriate specialist availability to provide continuity of care to most HFP enrollees. For those enrollees who establish medical necessity for a specialist that is not available within the Plan's network, the Plan will be obligated under the Knox Keene Act to arrange for out-of-network care.

Santa Cruz County

Inquiry: According to data submitted for the Phase 3 transition, it appears that 25% of the Plan's contracted Medi-Cal PCPs are accepting new Medi-Cal patients in Santa Cruz County. Please confirm whether this number conforms to the Plan's data regarding the percentage of PCPs who are accepting new patients. If it does not conform, please provide

updated PCP network sheets identifying the PCPs who are accepting new patients. If it does conform to the Plan's data, please explain what steps the Plan is taking to ensure that an appropriate number of PCPs are available to accept transitioning Phase 3 HFP enrollees.

- **Plan Response:** The Plan verified that the percentage of PCPs accepting new patients provided in the Phase 3 Report conforms to the Plan's information. The Plan has open capacity within its current Medi-Cal network to accommodate over 29,000 new enrollees, and estimates it will be receiving approximately 1,800 HFP enrollees transitioning into Medi-Cal in Santa Cruz County. Therefore, the Plan believes it has an appropriate number of PCPs accepting new patients to provide care for the transitioning Phase 3 population in Santa Cruz County. The Plan indicates that it has also contacted its contracted PCPs to confirm their intent to keep any current HFP enrollees when they transition into Medi-Cal.
- **Assessment:** Based on the Plan's open network capacity to accommodate over 29,000 new enrollees, it appears that the Plan has ample PCPs who are accepting new patients to accommodate the transitioning HFP enrollees. Data also indicate that there are PCPs accepting new patients in all but one city that contained HFP PCPs. The Medi-Cal managed care network offers PCPs in all of the same geographic regions served by the HFP product, and it appears that enrollees will have geographic access to care on par with what was available in the HFP network.

Inquiry: In the Plan's Phase 3 network data, the Plan identified a number of clinics as PCPs in its PCP provider network. Please complete the attached template identifying the individual physicians that are associated with each contracting clinic.

- **Plan Response:** The Plan provided a list of all individual providers who serve patients via the Plan's contracted clinics. The departments compared the provider information against the HFP provider network in that region and found that 92% of the providers contracted with the Phase 3 HFP plan in that county are also available in Central California Alliance for Health's Medi-Cal network. When the overlap in networks is compared against the HFP enrollee provider assignments, it appears that 96% of transitioning Phase 3 HFP enrollees will be able to continue seeing their PCP upon transition to Medi-Cal.
- **Assessment:** The new data indicates that there is a high level of overlap between the Phase 3 HFP network and the Medi-Cal network and that a high percentage of enrollees will be able to continue seeing their treating PCP post-transition. Based on this new data, the departments have identified that the original overlap percentage reported in the Phase 3 Report (8%) was inaccurate. The new data indicates that the transition is unlikely to create any major disruptions in continuity of primary care.

Gold Coast Health Plan

Inquiry: *Plan data indicate that the Plan does not offer any Medi-Cal PCPs in Piru. HFP data indicate that 85 HFP enrollees are currently assigned to a PCP in Piru. Please explain how the Plan will ensure appropriate geographic access to primary care for enrollees currently assigned to PCPs in this location.*

- **Plan Response:** The Plan provided further data indicating that the Plan is contracted with one physician assistant who is available to see patients at the Piru Family Medical Center in the city of Piru. The Plan also recently added one additional physician to its network who will rotate between Piru and Fillmore clinic locations.
- **Assessment:** The new data indicate that the Plan has primary care providers available to treat patients in the city of Piru; therefore it appears that the Plan will be able to provide geographic access to transitioning enrollees commensurate with the geographic access that was available in the HFP network.

Health Plan of San Mateo

Inquiry: *In the Plan's Phase 3 network data, the Plan indicated that it was in the process of entering into a contract with Kaiser Foundation Health Plan in San Mateo County. Please provide information as to the status of that contract, including the expected date of execution. If the contract has already been executed, please indicate the date on which the contract was executed. If the proposed contract is not going forward or is unlikely to be executed prior to the Phase 3 transition (August 1, 2013), please describe what steps the Plan is taking to ensure continuity of care for Phase 3 HFP enrollees who are currently participating in Kaiser Foundation Health Plan in San Mateo County when the enrollees transition into Medi-Cal.*

- **Plan Response:** The Plan indicates that the contract has been finalized and is currently awaiting final signatures. The Plan anticipates that the contract will be approved and executed by July 1, 2013.
- **Assessment:** Based on the Plan's response, it appears that the Plan has made progress in its contracting efforts with Kaiser and that a contract is highly likely to be executed by the end of June. The departments will continue to monitor the progress of this contract and will take additional steps to review the adequacy of the San Mateo County Medi-Cal managed care network if the Plan does not ultimately enter into a contract with Kaiser.

Inland Empire Health Plan

San Bernardino County

Inquiry: *Plan data indicate that the Plan does not offer any Medi-Cal PCPs in Big Bear Lake. HFP data indicate that 151 HFP enrollees are currently assigned to a PCP in Big*

Bear Lake. Please explain how the Plan will ensure appropriate geographic access to primary care for enrollees currently assigned to PCPs in this location.

- **Plan Response:** The Plan has identified the PCP who is currently treating enrollees in Big Bear Lake and is in the process of entering into a contract or Letter of Agreement with that PCP. The Plan states that it intends to have an agreement or contract in place with this PCP prior to August 1, 2013 so that enrollees will not experience a disruption in care.
- **Assessment:** The Plan has made efforts to recruit a PCP in this region so that transitioning HFP enrollees will be able to continue seeing a geographically accessible PCP. Because the Plan is working with the existing HFP PCP in this area, transitioning enrollees are not likely to experience a disruption in access to primary care. The departments will continue to monitor the Plan's success in contracting with this PCP and will take additional steps to review the adequacy of the San Bernardino County Medi-Cal managed care network if the Plan does not ultimately enter into a contract with this provider.

Kaiser Foundation Health Plan

Inquiry: In the Plan's Phase 3 network data, the Plan indicated that it was in the process of entering into a contract with a Medi-Cal partner plan in Fresno, Kern, Kings, Madera, San Joaquin, San Mateo, Stanislaus, Ventura, and Yolo Counties. Please provide information as to the status of those contracts, including the expected date of execution. If the contracts have already been executed, please indicate the date on which the contract was executed. If the proposed contracts are not going forward or are unlikely to be executed prior to the Phase 3 transition (August 1, 2013), please describe what steps the Plan is taking to assist in the transition of its Phase 3 HFP enrollees into Medi-Cal.

- **Plan Response:** The Plan states that it has been engaging in ongoing meetings with all proposed Medi-Cal plan partners and continues active negotiations with few open issues remaining. In some cases, the Plan is only awaiting final ratification by the Medi-Cal plan's board of directors or approval by DHCS. In the Southern California Region, the Plan expects its contracts with Gold Coast Health Plan and Kern Health Systems to be executed by July 15, 2013. In the Northern California Region, the Plan expects contract negotiations with Cal Viva, Health Plan of San Joaquin, Partnership Health Plan and Health Plan of San Mateo to conclude by July 1, 2013. The Plan states it is on track with its proposed Medi-Cal partner plans to have all contracts executed prior to the August 1, 2013 transition date. The Plan is currently awaiting approval of the expansion of its Medi-Cal network by the DMHC.
- **Assessment:** The information from Kaiser Foundation Health Plan, combined with information provided by the Medi-Cal partner plans, indicates that Kaiser is very close to finalizing subcontracting arrangements with the Phase 3 Medi-Cal plans. Such an arrangement will result in no change in PCP and will likely alleviate most continuity of

care concerns for HFP enrollees currently enrolled in Kaiser when they transition to Medi-Cal.

Kern Family Health Plan

Inquiry: In the Plan's Phase 3 network data, the Plan indicated that it was in the process of entering into a contract with Kaiser Foundation Health Plan in Kern County. Please provide information as to the status of that contract, including the expected date of execution. If the contract has already been executed, please indicate the date on which the contract was executed. If the proposed contract is not going forward or is unlikely to be executed prior to the Phase 3 transition (August 1, 2013), please describe what steps the Plan is taking to ensure continuity of care for Phase 3 HFP enrollees who are currently participating in Kaiser Foundation Health Plan in Kern County when the enrollees transition into Medi-Cal.

- **Plan Response:** The Plan indicates that a draft version of the contract was presented by the Kern Health Systems Board of Directors on June 13, 2013. The Board of Directors approved and authorized the contract to be signed pending resolution of all necessary details. The Plan expects final resolution of the contract in July.
- **Assessment:** Based on the Plan's response, it appears that the Plan has made progress in its contracting efforts with Kaiser and that a contract is highly likely to be executed by July. The departments will continue to monitor the progress of this contract and will take additional steps to review the adequacy of the Kern County Medi-Cal managed care network if the Plan does not ultimately enter into a contract with Kaiser.

Molina Health Plan of California

Sacramento County

Inquiry: In the Plan's Phase 3 network data, the Plan identified a number of clinics as PCPs in its PCP provider network. Please complete the attached template identifying the individual physicians that are associated with each contracting clinic.

- **Plan Response:** The Plan submitted data identifying the individual providers that operate out of the Plan's contracted Sacramento clinics. None of these providers are currently contracted with the Sacramento County Phase 3 HFP health plan, Health Plan of San Joaquin (HPSJ).
- **Assessment:** Overall, 13% of Phase 3 HFP PCPs (i.e. PCPs contracted with HPSJ for Sacramento County) are available in the Sacramento County Medi-Cal managed care network. The data from the Plan indicates that this percentage does not change when individual providers associated with contracted clinics are added to the equation. While the lower rate of overlap between the networks could implicate continuity of care for transitioning Phase 3 HFP enrollees, the Department of Health Care Services has worked with the Phase 3 Sacramento County HFP plan, HPSJ, and have arranged

for HPSJ to continue providing services to the Sacramento County Phase 3 HFP enrollees after the transition. Phase 3 HFP enrollees will continue to be assigned to HPSJ until the member chooses otherwise; therefore, it is not anticipated that a large number of Phase 3 HFP enrollees will be transitioning into the Sacramento County Medi-Cal health plans. Furthermore, the Medi-Cal managed care networks in Sacramento County appear to have adequate capacity and PCP availability to provide new PCPs for any HFP enrollee who may have to change PCPs as a result of the transition.

San Bernardino County

Inquiry: Plan data indicate that the Plan does not offer any Medi-Cal PCPs in Big Bear Lake. HFP data indicate that 151 HFP enrollees are currently assigned to a PCP in Big Bear Lake. Please explain how the Plan will ensure appropriate geographic access to primary care for enrollees currently assigned to PCPs in this location.

- **Plan Response:** The Plan states that it does not currently participate in Medi-Cal Managed Care in Big Bear Lake.
- **Assessment:** While this plan does not operate in Big Bear Lake, the other Medi-Cal Managed Care plan in San Bernardino County, Inland Empire Health Plan, has indicated that it is taking steps to contract with a provider in that city. Phase 3 HFP enrollees residing in Big Bear Lake may have access to a primary care provider near their residence by selecting Inland Empire Health Plan as their Medi-Cal managed care plan. The Medi-Cal managed care network in San Bernardino County, overall, appears to have appropriate geographic access for the transitioning enrollees.

Partnership Health Plan

Marin County

Inquiry: According to data submitted for the Phase 3 transition, it appears that 45% of the Plan's contracted Medi-Cal individual PCPs and clinics are accepting new Medi-Cal patients in Marin County. Please confirm whether this number conforms to the Plan's data regarding the percentage of PCPs who are accepting new patients. If it does not conform, please provide updated PCP network sheets identifying the PCPs who are accepting new patients. If it does conform to the Plan's data, please explain what steps the Plan is taking to ensure that an appropriate number of PCPs are available to accept transitioning Phase 3 HFP enrollees.

- **Plan Response:** The Plan verified that the percentage of PCPs accepting new patients provided in the Phase 3 Report conforms to the Plan's information. The Plan will contact all PCP sites in its provider network to inquire on their intent to keep any current HFP enrollees when they transition into Medi-Cal. The Plan will also rely on its FQHC network. All FQHC clinics, in all counties, are open to new patients. The Plan states that it has developed strong working relationships with its entire Primary

Care network, and thus will be able to assign new Medi-Cal enrollees based on “current patient” status with a practice that may have a status of “Closed.”

- **Assessment:** The Medi-Cal managed care network appears to have adequate capacity to accommodate the transitioning HFP enrollees and is able to provide adequate access to care. The Phase 3 Report indicated that there are Medi-Cal PCPs accepting new patients in almost all cities where the HFP plan offered PCPs. For those cities in the HFP network that do not have Medi-Cal PCPs who are accepting new patients, the data indicate that the Medi-Cal network offers PCPs within 10 miles or 30 minutes of those cities. This geographic availability of PCPs suggests that HFP enrollees who have to change PCPs will be able to see Medi-Cal PCPs in their geographic region. The FQHC clinics also provide additional available PCPs to accept transitioning Phase 3 HFP enrollees.

Inquiry: In the Plan’s Phase 3 network data, the Plan identified a number of clinics as PCPs in its PCP provider network. Please complete the attached template identifying the individual physicians that are associated with each contracting clinic.

- **Plan Response:** The Plan provided a list of all individual providers who serve patients via the Plan’s contracted clinics. The departments compared the provider information against the HFP provider network in that region and found that 61% of the providers contracted with the Phase 3 HFP plan in that county are also available in Partnership Health Plan’s Medi-Cal network.¹
- **Assessment:** The new data indicate that there is a moderate level of overlap between the Phase 3 HFP network and the Medi-Cal network. Based on this new data, the departments have identified that the original overlap percentage reported in the Phase 3 Report (5%) was inaccurate. The new data indicate that the transition is unlikely to create any major disruptions in continuity of primary care.

Mendocino County

Inquiry: In the Plan’s Phase 3 network data, the Plan identified a number of clinics as PCPs in its PCP provider network. Please complete the attached template identifying the individual physicians that are associated with each contracting clinic.

- **Plan Response:** The Plan provided a list of all individual providers who serve patients via the Plan’s contracted clinics. The departments compared the provider information against the HFP provider network in that region and found that 77% of the providers contracted with the Phase 3 HFP plan in that county are also available in Partnership Health Plan’s Medi-Cal network.²
- **Assessment:** The new data indicates that there is a moderately high level of overlap between the Phase 3 HFP network and the Medi-Cal network. Based on this new

¹ The Phase 3 HFP plan in this county, Anthem Blue Cross, did not provide complete PCP assignment data, so the departments are unable to calculate how many HFP enrollees are assigned to the PCPs that also participate in the Medi-Cal managed care network.

² The Phase 3 HFP plan in this county, Anthem Blue Cross, did not provide complete PCP assignment data, so the departments are unable to calculate how many HFP enrollees are assigned to the PCPs that also participate in the Medi-Cal managed care network.

data, the departments have identified that the original overlap percentage reported in the Phase 3 Report (0%) was inaccurate. The new data indicates that the transition is unlikely to create any major disruptions in continuity of primary care.

Napa County

Inquiry: According to data submitted for the Phase 3 transition, it appears that 47% of the Plan’s contracted Medi-Cal individual PCPs and clinics are accepting new Medi-Cal patients in Napa County. Please confirm whether this number conforms to the Plan’s data regarding the percentage of PCPs who are accepting new patients. If it does not conform, please provide updated PCP network sheets identifying the PCPs who are accepting new patients. If it does conform to the Plan’s data, please explain what steps the Plan is taking to ensure that an appropriate number of PCPs are available to accept transitioning Phase 3 HFP enrollees.

- **Plan Response:** The Plan verified that the percentage of PCPs accepting new patients provided in the Phase 3 Report conforms to the Plan’s information. The Plan will contact all PCP sites in its provider network to inquire on their intent to keep any current HFP enrollees when they transition into Medi-Cal. The Plan will also rely on its FQHC network. All FQHC clinics, in all counties, are open to new patients. The Plan will closely monitor continuity of care and capacity for new enrollees through annual surveys, and credentialing of new practitioners. The Plan will also monitor member access complaints and immediately address any complaints related to accessing PCPs.
- **Assessment:** The Medi-Cal managed care network appears to have adequate capacity to accommodate the transitioning HFP enrollees and is able to provide adequate access to care in Napa County. Data indicate that all cities that contain HFP PCPs also contain Medi-Cal PCPs who are accepting new patients; therefore, transitioning HFP enrollees will have geographically accessible PCPs available to them in the Medi-Cal network. The FQHC clinics also provide additional available PCPs to accept transitioning Phase 3 HFP enrollees.

Inquiry: In the Plan’s Phase 3 network data, the Plan identified a number of clinics as PCPs in its PCP provider network. Please complete the attached template identifying the individual physicians that are associated with each contracting clinic.

- **Plan Response:** The Plan provided a list of all individual providers who serve patients via the Plan’s contracted clinics. The departments compared the provider information against the HFP provider network in that region and found that 67% of the providers contracted with the Phase 3 HFP plan in that county are also available in Partnership Health Plan’s Medi-Cal network.³
- **Assessment:** The new data indicate that there is a moderate level of overlap between the Phase 3 HFP network and the Medi-Cal network. Based on this new data, the

³ The Phase 3 HFP plan in this county, Anthem Blue Cross, did not provide complete PCP assignment data, so the departments are unable to calculate how many HFP enrollees are assigned to the PCPs that also participate in the Medi-Cal managed care network.

departments have identified that the original overlap percentage reported in the Phase 3 Report (0%) was inaccurate. The new data indicate that the transition is unlikely to create any major disruptions in continuity of primary care.

Solano County

Inquiry: According to data submitted for the Phase 3 transition, it appears that 43% of the Plan's contracted Medi-Cal individual PCPs and clinics are accepting new Medi-Cal patients in Solano County. Please confirm whether this number conforms to the Plan's data regarding the percentage of PCPs who are accepting new patients. If it does not conform, please provide updated PCP network sheets identifying the PCPs who are accepting new patients. If it does conform to the Plan's data, please explain what steps the Plan is taking to ensure that an appropriate number of PCPs are available to accept transitioning Phase 3 HFP enrollees.

- **Plan Response:** The Plan verified that the percentage of PCPs accepting new patients provided in the Phase 3 Report conforms to the Plan's information. The Plan will rely on its FQHC network to provide primary care for transitioning HFP enrollees. All FQHC clinics are accepting new members and have adequate capacity. A new FQHC clinic opened in November 2012, and the other FQHC clinics are recruiting practitioners to provide adequate access for the transitioning enrollees.
- **Assessment:** The Medi-Cal managed care network appears to have adequate capacity to accommodate the transitioning HFP enrollees and is able to provide adequate access to primary care. The Phase 3 Report indicated that there are Medi-Cal PCPs accepting new patients in almost all cities where the HFP plan offered PCPs. For those cities in the HFP network that do not have Medi-Cal PCPs who are accepting new patients, the data indicate that the Medi-Cal network offers PCPs within 10 miles or 30 minutes of those cities. This geographic availability of PCPs suggests that HFP enrollees who have to change PCPs will be able to see Medi-Cal PCPs in their geographic region. The FQHC clinics also provide additional available PCPs to accept transitioning Phase 3 HFP enrollees.

Inquiry: In the Plan's Phase 3 network data, the Plan identified a number of clinics as PCPs in its PCP provider network. Please complete the attached template identifying the individual physicians that are associated with each contracting clinic.

- **Plan Response:** The Plan provided a list of all individual providers who serve patients via the Plan's contracted clinics. The departments compared the provider information against the HFP provider network in that region and found that 63% of the providers contracted with the Phase 3 HFP plan in that county are also available in Partnership Health Plan's Medi-Cal network.⁴

⁴ The Phase 3 HFP plan in this county, Anthem Blue Cross, did not provide complete PCP assignment data, so the departments are unable to calculate how many HFP enrollees are assigned to the PCPs that also participate in the Medi-Cal managed care network.

- **Assessment:** The new data indicate that there is a moderate level of overlap between the Phase 3 HFP network and the Medi-Cal network. Based on this new data, the departments have identified that the original overlap percentage reported in the Phase 3 Report (18%) was inaccurate. The new data indicate that the transition is unlikely to create any major disruptions in continuity of primary care.

Sonoma County

Inquiry: According to data submitted for the Phase 3 transition, it appears that 50% of the Plan’s contracted Medi-Cal individual PCPs and clinics are accepting new Medi-Cal patients in Sonoma County. Please confirm whether this number conforms to the Plan’s data regarding the percentage of PCPs who are accepting new patients. If it does not conform, please provide updated PCP network sheets identifying the PCPs who are accepting new patients. If it does conform to the Plan’s data, please explain what steps the Plan is taking to ensure that an appropriate number of PCPs are available to accept transitioning Phase 3 HFP enrollees.

- **Plan Response:** The Plan verified that the percentage of PCPs accepting new patients provided in the Phase 3 Report conforms to the Plan’s information. The Plan will rely on its FQHC network to provide primary care for transitioning HFP enrollees. All FQHC clinics are accepting new members and have adequate capacity.
- **Assessment:** The Medi-Cal managed care network appears to have adequate capacity to accommodate the transitioning HFP enrollees and is able to provide adequate access to care. The Phase 3 Report indicated that there are Medi-Cal PCPs accepting new patients in almost all cities where the HFP plan offered PCPs. For those cities in the HFP network that do not have Medi-Cal PCPs who are accepting new patients, the data indicate that the Medi-Cal network offers PCPs within 10 miles or 30 minutes of those cities. This geographic availability of PCPs suggests that HFP enrollees who have to change PCPs will be able to see Medi-Cal PCPs in their geographic region. The FQHC clinics also provide additional available PCPs to accept transitioning Phase 3 HFP enrollees.

Inquiry: In the Plan’s Phase 3 network data, the Plan identified a number of clinics as PCPs in its PCP provider network. Please complete the attached template identifying the individual physicians that are associated with each contracting clinic.

- **Plan Response:** The Plan provided a list of all individual providers who serve patients via the Plan’s contracted clinics. The departments compared the provider information against the HFP provider network in that region and found that 68% of the providers contracted with the Phase 3 HFP plan in that county are also available in Partnership Health Plan’s Medi-Cal network.⁵
- **Assessment:** The new data indicate that there is a moderate level of overlap between the Phase 3 HFP network and the Medi-Cal network. Based on this new data, the

⁵ The Phase 3 HFP plan in this county, Anthem Blue Cross, did not provide complete PCP assignment data, so the departments are unable to calculate how many HFP enrollees are assigned to the PCPs that also participate in the Medi-Cal managed care network.

departments have identified that the original overlap percentage reported in the Phase 3 Report (14%) was inaccurate. The new data indicate that the transition is unlikely to create any major disruptions in continuity of primary care.

Yolo County

Inquiry: In the Plan's Phase 3 network data, the Plan identified a number of clinics as PCPs in its PCP provider network. Please complete the attached template identifying the individual physicians that are associated with each contracting clinic.

- **Plan Response:** The Plan provided a list of all individual providers who serve patients via the Plan's contracted clinics. The departments compared the provider information against the HFP provider network in that region and found that 71% of the providers contracted with the Phase 3 HFP plan in that county are also available in Partnership Health Plan's Medi-Cal network. This percentage does not include the potential addition of Kaiser providers to the network. When the overlap in networks is compared against the HFP enrollee provider assignments, it appears that 96% of transitioning Phase 3 HFP enrollees will be able to continue seeing their PCP upon transition to Medi-Cal.
- **Assessment:** The new data indicate that there is a moderately high level of overlap between the Phase 3 HFP network and the Medi-Cal network and that a high percentage of enrollees will be able to continue seeing their treating PCP post-transition. Based on this new data, the departments have identified that the original overlap percentage reported in the Phase 3 Report (7%) was inaccurate. The new data indicate that the transition is unlikely to create any major disruptions in continuity of primary care.

ATTACHMENTS

ATTACHMENT 1 – PHASE 3 CLINIC PROVIDER TEMPLATE

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**ATTACHMENT 2 – HEALTHY FAMILIES PROGRAM TRANSITION TO MEDI-CAL
PHASE 3 ENROLLMENT BREAKDOWN**

Upon implementation of the transition, all new applicants will be evaluated for coverage under the Medi-Cal program.
Members will maintain linkage to the sub plan, through the primary Medi-Cal health plan.

Counties Transitioning on August 1, 2013

County	Medi-Cal Plan Model	Healthy Families Health Plan	Approximate Enrollment	Medi-Cal Managed Care Plan Choices	Medi-Cal Dental Enrollment
Fresno	2Plan	Kaiser	3,223	Anthem Blue Cross <i>or</i> CalViva Health	Denti-Cal
Kern	2Plan	Anthem Blue Cross	2,589	Health Net <i>or</i> Kern Family Health	Denti-Cal
		Kaiser	2,716		
Kings	2Plan	Kaiser	33	Anthem Blue Cross <i>or</i> CalViva Health	Denti-Cal
Madera	2Plan	Kaiser	444	Anthem Blue Cross <i>or</i> CalViva Health	Denti-Cal
Marin	COHS	Anthem Blue Cross	1,324	Partnership Health	Denti-Cal
Mendocino	COHS	Anthem Blue Cross	1,796	Partnership Health	Denti-Cal
Merced	COHS	Health Plan of San Joaquin	3,118	Central California Alliance for Health	Denti-Cal
		Anthem Blue Cross	3,921		
Napa	COHS	Anthem Blue Cross	2,343	Partnership Health	Denti-Cal
Orange	COHS	Anthem Blue Cross	12,026	CalOptima	Denti-Cal
Riverside	2Plan	Anthem Blue Cross	8,996	Inland Empire Health Plan <i>or</i> Molina Healthcare	Denti-Cal
		Community Health Group	379		
Sacramento	2Plan	Health Plan of San Joaquin	95	Health Net, Kaiser, Molina Healthcare, <i>or</i> Anthem Blue Cross	Dental Managed Care
San Bernardino	2Plan	Anthem Blue Cross	6,624	Molina Healthcare <i>or</i> Inland Empire Health Plan	Denti-Cal
San Diego	2Plan	Anthem Blue Cross	8,869	Community Health Group, Care 1 st , Molina Healthcare, Health Net, <i>or</i> Kaiser	Denti-Cal

**ATTACHMENT 2 – HEALTHY FAMILIES PROGRAM TRANSITION TO MEDI-CAL
PHASE 3 ENROLLMENT BREAKDOWN**

Upon implementation of the transition, all new applicants will be evaluated for coverage under the Medi-Cal program. Members will maintain linkage to the sub plan, through the primary Medi-Cal health plan.

Counties Transitioning on August 1, 2013

County	Medi-Cal Plan Model	Healthy Families Health Plan	Approximate Enrollment	Medi-Cal Managed Care Plan Choices	Medi-Cal Dental Enrollment
San Francisco	2Plan	Health Net	926	San Francisco Health Plan <i>or</i> Anthem Blue Cross	Denti-Cal
San Joaquin	2Plan	Anthem Blue Cross	1,588	Health Plan of San Joaquin, Anthem Blue Cross, Health Net	Denti-Cal
		Kaiser	5,747		
San Luis Obispo	COHS	Anthem Blue Cross	3,125	CenCal Health	Denti-Cal
San Mateo	COHS	Anthem Blue Cross	1	Health Plan of San Mateo	Denti-Cal
		Kaiser	3,776		
Santa Cruz	COHS	Anthem Blue Cross	1,599	Central California Alliance for Health	1,599
Solano	COHS	Health Net	788	Partnership Health Plan	788
		Anthem Blue Cross	11		11
Sonoma	COHS	Anthem Blue Cross	4,881	Partnership Health Plan	4,881
Stanislaus	2Plan	Anthem Blue Cross	1,044	Health Plan of San Joaquin, Health Net	1,044
Ventura	COHS	Ventura County Health Care Plan	9,282	Gold Coast Health Plan	9,282
		Anthem Blue Cross	4,862		4,862
		Kaiser	2,629		2,629
Yolo	COHS	Health Net	2,105	Partnership Health Plan	2,105
		Kaiser	702		702
		Anthem Blue Cross	4		4
Total			101,837		