

PROVIDER Update



NEWS & ANNOUNCEMENTS

SEPTEMBER 1, 2021

UPDATE 21-457m

15 PAGES

Help Your Patients Achieve Better Health Outcomes

Use quality management programs and resources to support the care you give

This update provides an overview of the components of the Health Net* multifaceted Medi-Cal quality management program. It includes quality improvement (QI) processes and instructions on how to get more information from the Health Net provider website as described in this update.

Quality management program scope

Health Net's quality management program is designed to monitor and evaluate the adequacy and appropriateness of health and administrative services on a continuous and systematic basis. The QI program covers the development and implementation of standards for clinical care and service, measurement of conformance to the standards, and implementation of actions to improve performance.

The scope of the program contains:

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THIS UPDATE APPLIES TO CALIFORNIA PROVIDERS:

- Physicians
- Participating Physician Groups
- Hospitals
- Ancillary Providers

LINES OF BUSINESS:

- HMO/POS/HSP
- PPO
- EPO
- Medicare Advantage (HMO)
- Cal MediConnect (Los Angeles/San Diego)
- Medi-Cal
 - Kern
 - Los Angeles
 - Molina
 - Riverside
 - Sacramento
 - San Bernardino
 - San Diego
 - San Joaquin
 - Stanislaus
 - Tulare

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Impact of COVID-19 on regulations and requirements

The following table lists impacts to the QI program due to COVID-19. Providers must comply with all applicable contract requirements, state and federal regulations and guidance, including All Plan Letters (APLs) and Policy Letters.

COVID-19 impacts	Description
Healthcare Effectiveness Data and Information Set (HEDIS®)	For Measurement Year (MY) 2020/Reporting Year 2021 and going forward, the Department of Health Care Services (DHCS) will allow managed care plans the option to report administrative or hybrid rates for measures that allow for both reporting methods according to the National Committee for Quality Assurance (NCQA) specifications.
Consumer Assessment of Healthcare Providers & Systems (CAHPS®) Survey	Results are to be shared with NCQA for accreditation purposes.
NCQA Health Plan Ratings (HPRs)	For HPRs in 2021, NCQA will implement a special Overall Rating Policy for NCQA-Accredited plans: Ratings will display the higher of the Overall Rating score between HPR 2021 and HPR 2019.
HEDIS measures with telehealth options	The July 1, 2020 release of the NCQA HEDIS MY 2020 and 2021 Volume 2 Technical Specifications provided guidance of telehealth options on 40 HEDIS measures. The updates follow Centers for Medicare & Medicaid (CMS) guidance on telehealth services and support the increased need for a telehealth option during the pandemic. On March 31, 2021, NCQA released the HEDIS MY 2021 Volume 2: Technical Update. This includes corrections to HEDIS MY 2020 & MY 2021 Volume 2 Technical Specifications for MY 2021 reporting.
Initial health assessment (IHA) and Staying Healthy Assessment (SHA)	Per DHCS APL 20-004 (revised), ¹ contractual requirements of completing the IHA for all new members have been suspended until the end of the public health emergency. Providers are to complete the IHA when the public health emergency is over. The use of email, telephone, or telehealth to administer the SHA is acceptable.
Health risk assessments (HRAs)	Per DHCS APL 20-011 (revised) ² released on July 8, 2021, the extension of HRA completion time frames for newly enrolled Seniors and Persons with Disabilities (SPDs), as a result of COVID-19 public health emergency, ended June 30, 2021. Effective July 1, 2021, plans must complete HRAs following the standard time frames set prior to the extension. Completion of HRAs for members newly enrolled on or prior to June 30, 2021 will remain subject to the extended time frames.

Impact of COVID-19 on regulations and requirements, continued

COVID-19 impacts	Description
Facility site reviews (FSRs), medical record reviews (MRRs) and physical access review surveys (PARS)	Per DHCS APL 20-011 (revised) ² released on July 8, 2021, the suspension of FSRs, MRRs and PARS, as a result of the COVID-19 public health emergency, ended on Jul 1, 2021. Plans must resume operations completely within six months from July 1, 2021.
Patient care strategies	The DHCS supplement to APL 19-017, ³ released on April 30, 2020, provides recommendations of modified patient care strategies to apply safe social distancing practice guidelines including: <ul style="list-style-type: none">• Coverable telehealth services.• Drive-thru/curb-side visits.• Virtual health education.• COVID-19 advisories for high-risk patients, and/or• Spatially separating well visits from sick visits (i.e., pediatric/infant wellness visits and immunizations, and prenatal/postpartum care).

Stay informed about COVID-19

For ongoing changes and requirements for COVID-19, visit the following web sites:

- www.ncqa.org/covid
- www.dhcs.ca.gov/Pages/DHCS-COVID-19-Response.aspx
- www.cdc.gov/coronavirus/2019-ncov/index.html
- www.healthnet.com/content/healthnet/en_us/providers.html > select *Health Net Alerts* under Covid-19 Updates
- www.healthnet.com/content/healthnet/en_us/covid-19-updates.html

Open clinical dialogue

Health Net's Medi-Cal *Provider Participation Agreement (PPA)* states that participating providers can talk freely with members about their medical conditions, treatment options and medications, regardless of limits to coverage.

Quality performance improvement projects

Health Net conducts quality performance improvement projects (PIPs) targeting specific health care issues that impact a significant number of members. PIPs may also address the use of health services to enhance health outcomes. It includes testing small-scale changes at the provider-, member- and health plan-level to improve the quality of members' health care and outcomes.

DHCS introduced a new PIP cycle, in November 2020. The projects currently in process are:

- Improving childhood immunization rates.
- Reducing disparities in breast cancer screening outcomes.

PIPs require frequent reporting to DHCS and Health Services Advisory Group (HSAG). There are specific expectations for working with a clinic or federally qualified health center (FQHC) which include:

- Completing a process map.
- Failure mode and effect analysis.

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- Intervention analysis.
 - Monthly progress monitoring.

Select provider groups are engaging in these focused studies. The results and lessons learned will be provided at the end of the project. Depending on the progress of the initiatives, Health Net will expand the interventions to other clinics and potentially across all counties.

Quality measures and surveys

Health Net measures quality of care and services provided to members through HEDIS performance measures for care and service, the CAHPS for member satisfaction, member appeals and grievances, and access and availability surveys. In addition, Health Net conducts an annual provider satisfaction survey to find ways to better serve its participating providers.

Starting in 2019, DHCS began leveraging the CMS Adult and Child Core sets to measure health plan performance. The new measure set, called the Managed Care Accountability Set (MCAS), holds plans to significantly more measures and addresses care needs across preventive, chronic and behavioral health. DHCS revised the MCAS for MY 2021 and holds the plan accountable to meet minimum performance levels at the 50th percentile on the following 15 measures:

- Breast Cancer Screening (BCS).
- Cervical Cancer Screening (CCS).
- Child and Adolescent Well-Care Visits (WCV).
- Childhood Immunization Status – Combo 10 (CIS-10).
- Chlamydia Screening in Women (CHL).
- Comprehensive Diabetes Care: HbA1c Poor Control > 9.0% (CDC-H9).
- Controlling High Blood Pressure < 140/90 mm Hg (CBP).
- Immunizations for Adolescents – Combo 2 (IMA-2).
- Prenatal & Postpartum Care: Timeliness of Prenatal Care (PPC-Pre).
- Prenatal & Postpartum Care: Postpartum Care – (PPC-Pst).
- Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents: Body Mass Index Assessment (WCC-BMI).
- Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents: Nutrition (WCC-N).
- Weight Assessment and Counseling for Nutrition and Physical Activity for Children/Adolescents: Physical Activity (WCC-PA).
- Well-Child Visits in the First 30 months of Life – Six or more well child visits in the first 15 months (W30).
- Well-Child Visits in the First 30 Months of Life – Two or more visits during 15–30 months (W30).

Appropriate timeliness of services, outreach to members, clinical documentation, correct coding, as well as timely and complete encounter submissions are important elements of meeting preventive care guidelines. Health Net offers provider offices training materials, member outreach calls, member newsletters, and an online provider newsletter. All the information is designed to help providers and members accomplish these preventive measures.

MHN Outreach Program

MHN is Health Net’s behavioral health division. Practitioners and providers may refer members for behavioral health services or members can self-refer by calling MHN at the phone number on their Health Net ID cards. The QI

Department utilizes several specific quality initiatives to help improve members' physical and mental health outcomes. The health plan collaborates with MHN on quality improvement activities that may reach your office or practices.

Overall, members and providers may receive live calls from MHN's quality team, providing members and providers with important educational information or reminders to take action when necessary. The focus of these initiatives may include antidepressant medication management, follow-up for children prescribed ADHD medication, and coordinating referrals and care. Below is a summary of the collaborative quality improvement projects:

MHN telephonic outreach to –

- Families that have children who are prescribed ADHD medication.
- Physicians who are prescribing ADHD medication.
- Members about antidepressant medication management and the importance of coordination of care.

MHN written outreach to –

- Physicians about antidepressant medication management and the importance of coordination of care.

Disease Management program

The Disease Management program aims to identify members at risk for asthma, diabetes and heart failure. The goal of the program is to help improve the care of members with chronic conditions by empowering individuals and working with health care providers to manage their condition and prevent complications.

Health Net mails educational materials and information about the program to enrolled members. Health Net conducts outbound telephonic interventions and makes referrals to case management as needed. A health plan physician or case manager may also refer members to the program, or members can self-refer.

To refer a member to the program, use the Case Management Referral Form in the Provider Library at providerlibrary.healthnetcalifornia.com. Then select *Forms and References*. Members may self-refer to the program by calling the customer service number on the back of their ID cards and request a referral to Care Management.

Health education programs, services and resources

The following interventions and resources are available at no cost to Medi-Cal members through self-referral or a referral from their primary care physician (PCP). For more information, members and providers can call the toll-free Health Education Information Line at 800-804-6074. Members will be directed to the appropriate service or resource based on their needs. Telephonic and website based services are available 24/7. Members and PCPs may request educational resources on health topics such as, but not limited to, nutrition, tobacco prevention and cessation, HIV/STD prevention, family planning, exercise, dental, perinatal, diabetes, asthma, substance abuse and much more. Print educational resources are sent to members within two weeks of a request.

Fit Families for Life – *Be in Charge!* weight management programs

Providers should complete and fax a copy of the Fit Families for Life – *Be in Charge!* Program Referral form to the Health Net Health Education Department at 800-628-2704 to refer members to the weight control program, or to request program materials and resources. To request a copy of the Fit Families for Life Program Referral Form, contact the Health Net Health Education Department at 800-804-6074. Members interested in the program and nutrition related materials may also contact the Health Net Health Education Department.

Fit Families for Life – Home Edition

The Home Edition program is one of a number of member-based offerings under the Fit Families for Life – *Be in Charge!* program. It is a five-week, home-based family intervention program that promotes healthier lifestyles. Through goal-setting strategies, participants receive guidance on making better food choices and increasing physical activity. A program workbook covers topics about how to read a nutritional facts label, tips for adding fruits and vegetables to everyday meals, family involvement in the kitchen, tips for eating out, and aerobic

exercise options. A healthy recipes cookbook and exercise stretch band accompany the workbook. Program materials are available in English and Spanish, which providers can request for Health Net members (regardless of weight status).

Healthy Habits for Healthy People

The Healthy Habits for Healthy People resource guides older adults in eating healthy and being active. Topics include important dietary nutrients, tips to address eating problems, cooking and shopping when limitations are present, exercise, and much more. Members receive a booklet, exercise stretch band and cookbook. The Healthy Habits for Healthy People program is also available in a community workshop format. Materials extended to all participants at no cost. English or Spanish.

Start Smart for Your Baby

We want to help members take care of themselves and their babies from the time they find out they are pregnant through postpartum and newborn periods. Start Smart for Your Baby® (Start Smart) is a care management program for members who are pregnant.

The program can help members:

- Find a doctor.
- Set up appointments.
- Find community resources.
- Provide educational resources.
- Locate nurse and social worker support.

Members identified as having a high-risk pregnancy can receive extra help from case management nurses during the pregnancy. They can contact Member Services at 800-675-6110 to take part in the program.

Tobacco cessation program

The Kick It California tobacco cessation program (formerly known as the California Smokers' Helpline) is available to Health Net Medi-Cal members. The program offers free telephone counseling, self-help materials and online help in six languages (English, Spanish, Cantonese, Mandarin, Korean and Vietnamese). Specialized services are available to teens, pregnant women, and tobacco chewers to help members quit smoking and stay tobacco-free. Non-pregnant adult members are offered a 90-day regimen of all U.S. Food and Drug Administration (FDA) approved tobacco cessation medications with at least one medication available without prior authorization.

Health Net Medi-Cal members can enroll in the telephonic tobacco cessation program, without prior authorization for members of any age regardless if they opt to use tobacco cessation medications, by calling Kick It California at 800-300-8086, or online at www.kickitca.org (was previously www.nobutts.org). Health Net will cover tobacco cessation counseling for at least two separate quit attempts per year, without prior authorization, and with no mandatory break between quit attempts. Members may request a referral to group counseling by calling Health Net's Health Education Department at 800-804-6074.

Diabetes prevention program

Eligible members ages 18 and older with prediabetes can participate in a year long evidence-based, lifestyle change program. The program promotes and focuses on emphasizing weight loss through exercise, healthy eating and behavior modification. The program is designed to assist Medi-Cal members in preventing or delaying the onset of type 2 diabetes.

Healthy Hearts, Healthy Lives

Members have access to a heart health prevention toolkit (educational booklet and tracking journal) to learn how to maintain a healthy heart.

Behavioral health programs

Health Net offers myStrength, a personalized website and mobile application, to help members deal with depression, anxiety, stress, substance use, pain management, postpartum depression and more. Health Net provides members with Adverse Childhood Experiences (ACEs) Education and Resources. Members can request Health Net's ACEs education resources by contacting the toll-free Health Education Information Line or requesting them through their doctor.

Digital health education programs

T2X is a Web and mobile technology platform that educates and motivates individuals to adopt healthier lifestyles by addressing topics about nutrition, fitness, asthma, diabetes, smoking cessation, depression, vaccination, anti-bullying, teen pregnancy and sexual health. The goal of T2X is to increase participants' capacity to access and the appropriate use of their health coverage, become more engaged in their health care and health behavior decisions, and develop pro-health attitudes. Individuals ages 13 and older, regardless of health coverage status, can join online at www.t2x.me at no cost.

Health Net also offers myStrength®, a personalized website and mobile application, to help members deal with depression, anxiety, stress, substance use, pain management, postpartum depression, and more.

Health Net Community Connect

Powered by Aunt Bertha, Health Net Community Connect offers the largest online search and referral platform. There are 10 topics to choose from, such as food, housing and transportation. Then select a subtopic which will contain a list of services based on the zip code entered. The results can be viewed in over 100 languages. To use the tool, go to www.provider.healthnet.com. Scroll down the page and select Health Net Community Connect. Then enter a zip code and click on *Search*.

Case management program

Clinical licensed nurses and social workers lead our case management (CM) teams and are familiar with evidence-based resources and best practice standards. They also have experience with the population, the barriers and obstacles they face, and how socioeconomic factors impact their ability to access services. The Health Net CM team coordinates care for members whose needs are functional and social in nature, as well as those with complex physical and or behavioral health conditions, including high-risk pregnancy. Health Net uses a holistic approach by integrating referral and access to community resources, transportation, follow-up care, medication review, specialty care, and education to assist members in making better health care choices. Case managers partner with PCPs to support members with achieving their self-management health care goals.

Program components

This program supports Health Net members, families and caregivers by coordinating care and facilitating communication between health care providers. Once a member agrees to participate in the program, a care manager contacts the member's PCP to coordinate care. This helps facilitate an appropriate personalized level of care for members, which may include:

- Telephonic and face-to-face (as needed) interactions.
- Comprehensive assessment of medical, psychosocial, cognitive, medication adherence and durable medical equipment (DME) needs.

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- Development of an individual care treatment plan in collaboration with the member and the health care team that reflects the member's ongoing health care needs, abilities and preferences.
 - Consolidation of treatment plans from multiple providers into a single plan of care to avoid fragmented or duplicate care.
 - Coordination of treatment plans for acute or chronic illness, including emotional and social support issues.
 - Coordination of resources to promote the member's optimal health or improved functionality with referrals to other team members or programs, as appropriate.
 - Education and information about medical conditions and self-management skills, compliance with the medical plan of care, and other available services to reduce readmissions and inappropriate utilization of services.
 - Communication to the provider and medical home.
 - Support and education for pregnancies. High-risk pregnancies are offered extra help.

On an ongoing basis, Health Net evaluates the efficacy of this program by reviewing and comparing specific member outcomes and utilization before and after case management intervention.

Referrals

Providers may refer a member by email to cashp.acm.cma@healthnet.com or via fax to 866-581-0540. The Case Management Referral Form is available in the Provider Library at providerlibrary.healthnetcalifornia.com. Then select *Forms and References*. Members may self-refer to the program by calling 800-675-6110, option 2 and request case management.

Clinical practice guidelines

Health Net's evidence-based clinical practice guidelines are from nationally recognized sources and form the foundation for its disease management programs. All guidelines are reviewed and updated at least biannually and when new scientific evidence or national standards are published. Centene's Corporate Clinical Policy Committee and Health Net's Medical Advisory Council (MAC) adopt the clinical practice guidelines and tools which are available on the provider portal at www.healthnet.com/content/healthnet/en_us/providers/working-with-hn/medical_policies.html.

Guideline sources include, but are not limited to:

- Disease management – Clinical guidelines and overview summaries are available to providers. They can quickly reference information about chronic conditions, which include asthma, diabetes and heart failure (HF). Sources are found within the guidelines.
- Behavioral health – Clinical guidelines are available for such disorders as attention deficit hyperactivity disorder (ADHD) and substance use disorder.

Preventive health guidelines

Health Net recommends that participating providers follow the preventive guidelines adopted from the United States Preventive Services Task Force (USPSTF), Centers for Disease Control and Prevention (CDC), the American College of Obstetrics and Gynecology (ACOG), the American Cancer Society (ACS), and the American Academy of Family Physicians (AAFP) in the treatment of adult, senior, prenatal, and postpartum Health Net members. The guidelines from the American Academy of Pediatrics (AAP) and the Advisory Committee for Immunization Practices (ACIP) are recommended for the preventive care and treatment of infants, children and adolescents. A Health Net member's medical history and physical examination may indicate that further medical tests are needed. As always, the judgment of the treating physician is the final determinant of member care.

Current recommended guidelines of the specialty boards, academies and organizations used in the development of Health Net preventive health guidelines are available online at:

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- USPSTF – www.uspreventiveservicestaskforce.org
 - CDC – www.cdc.gov
 - ACOG – www.acog.org
 - ACS – www.cancer.org
 - AAP – www.aap.org
 - AAFP – www.aafp.org

Health Net preventive health guidelines are available on the provider portal at www.healthnet.com/content/healthnet/en_us/providers/working-with-hn/medical_policies.html. All information offered on the Health Net provider website is available to participating providers in print copy upon request.

Childhood blood lead level screenings

Providers who conduct periodic health assessments on Medi-Cal children ages 6 and under are responsible for screening children for elevated blood lead levels. Providers must follow the California Department of Public Health Guidelines for interpreting blood lead levels and performing follow-up activities for elevated levels.

Health Net provides electronic and web-based care gap reports to providers to help identify children who need a lead test. Reach out to your provider representative for information on how to obtain or review these reports. More information on DHCS' childhood blood lead screening requirements, including provider reporting and documentation, and exceptions to conducting lead screening, can be found on the provider portal at www.healthnet.com/content/healthnet/en_us/providers/working-with-hn/quality_imp_tools.html.

Initial health assessments

New Medi-Cal members must receive an IHA, which includes an age-appropriate history, preventive care services, physical examination and Individual Health Education Behavioral Assessment (IHEBA) within 120 days after the date of enrollment. In addition to assessing the member's health, this should be used to determine health practices, values, behaviors, knowledge, attitudes, cultural practices, beliefs, literacy levels and health education needs.

Members under age 18 months require a health assessment within periodicity timelines established by the AAP for ages 2 years and younger, whichever is less.

For members ages 21 and older, the IHA must follow DHCS guidelines and Health Net preventive care services guidelines. The preventive care guidelines in the USPSTF Guide to Clinical Preventive Services A and B Recommendations are considered the minimum acceptable standards for adult preventive care services (see www.uspreventiveservicestaskforce.org/Page/Name/uspstf-a-and-b-recommendations/). Guidelines for members under age 21 follow the AAP Recommendations for Preventive Pediatric Health Care's periodicity schedule for wellness examinations.

DHCS's approved IHEBA is the SHA. The SHA is the established assessment tool that enables PCPs to assess Medi-Cal members' current acute, chronic and preventive health needs. The SHA includes standardized questions to assist PCPs in:

Identifying high-risk behaviors, including tobacco use and alcohol consumption, of individual Medi-Cal members.

- Assigning priority to individual health education needs related to lifestyle, behavior, disability environment, culture and language.
- Initiating discussion, counseling and documenting health education interventions, referrals and follow-up care regarding high-risk behaviors.
- Identifying members whose health needs require coordination with appropriate community resources and other agencies for services not covered under the current contract.

All SHA questionnaires must include the PCP's name, signature and date. The SHA should be completed at age-related intervals, as appropriate. If a member refuses to complete the SHA, the PCP must make note of the refusal in the member's medical record.

Providers can access and download or print electronic versions of the SHA directly from the DHCS website at www.dhcs.ca.gov/formsandpubs/forms/pages/stayinghealthy.aspx. It is available in nine threshold languages. The SHA is also available in Arabic, English, Farsi, Khmer and Spanish in the Provider Library at providerlibrary.healthnetcalifornia.com. Then select *Forms and References*.

Providers are encouraged to contact the Health Net Health Education Department at 800-804-6074 for more information about SHA.

Health risk assessment

Health Net makes every effort to complete a health risk assessment (HRA) for new members. For new Senior and Persons with Disabilities, Health Net works to complete the HRA within 45 or 90 days of enrollment, depending on risk level, and on an annual basis thereafter. HRAs can be completed more frequently than annually, due to a change in health status or by member request. HRA completion helps with early and ongoing identification of member needs, enabling Health Net and participating physician group (PPG) care management teams to develop more comprehensive member-centric care plans. HRAs also help predict future consumption of medical care which is essential to the success of the care management program for both PPGs and Health Net.

Notice of access standards

Health Net has established access and availability standards, which are reviewed and revised annually as needed. The standards strive to ensure compliance with all applicable state, federal, regulatory and accreditation requirements. They also help ensure members have a comprehensive provider network and timely access to care.

Health Net monitors the network and evaluates whether members have sufficient access to practitioners and providers who meet members' care needs. These include waiting time standards for regular and routine appointments, urgent care appointments and after-hours care, and provisions for appropriate back-up for absences. The access standards are reviewed annually against applicable state and federal regulations and mandates, and are revised as needed. Health Net recommends providers review these periodically. After-hours scripts are also available that include examples on how to implement the script for live voice, auto attendant or answering machine messaging.

The complete set of access standards and after-hours scripts is available in the Medi-Cal Provider Manual, which can be accessed in the Provider Library at providerlibrary.healthnetcalifornia.com. Then select *Provider Oversight > Service and Quality Requirements > Access to Care and Availability Standards*. Providers who do not have access to the internet may contact the Health Net Provider Services Center to request printed copies of these standards and after-hours scripts.

Medical record documentation standards

Health Net has established standards for the administration of medical records to ensure medical records conform to good professional medical practice, support health management and permit effective member care. A good medical records management system not only provides support to clinical participating providers in the form of efficient data retrieval but also makes data available for statistical and quality-of-care analyses.

The medical record serves as a detailed analysis of the member's history, a means of communication to assist the multidisciplinary health care team in providing quality medical care, a resource for statistical analysis, and a potential source of defense to support information in a lawsuit. It is the participating provider's responsibility to ensure not only completeness and accuracy of content but also the confidentiality of the health record. Health Net requires that the provider adhere to the standards for maintaining member medical records and to safeguard the confidentiality of medical information.

Participating providers are responsible for responding to demands for information while protecting the confidentiality interests of Health Net members. All participating providers must have policies and procedures that address

confidentiality and the consequences of improper disclosure of protected health information (PHI). Providers should refer to the Medi-Cal Provider Manual in the Provider Library at providerlibrary.healthnetcalifornia.com. Then select *Medical Records > Confidentiality of Medical Records > Procedure* to review specific levels of security of medical records. Security of medical records must be addressed by the participating provider's policies and procedures governing the confidentiality of medical records and the release of members' PHI.

Health Net monitors medical record documentation compliance and implements appropriate interventions to improve medical recordkeeping. Medical record guidelines are available in the Provider Library at providerlibrary.healthnetcalifornia.com. Then select *Medical Records > Medical Record Documentation*. You can also request the information by contacting the Health Net Provider Services Center.

Medical record and facility site reviews

Health Net's Facility Site Review Compliance Department conducts periodic medical record reviews (MRRs) and facility site reviews (FSRs) to measure PCP compliance with current DHCS medical record documentation and facility standards. As part of the credentialing and recredentialing process, these audits are performed prior to admittance to the Medi-Cal network and at least every three years thereafter in accordance with DHCS requirements, or on an as needed basis for monitoring, evaluation or corrective action plan (CAP) issues. In an effort to decrease duplicative MRRs and FSRs and minimize the disruption of patient care at participating provider offices, Health Net and all other Medi-Cal managed care plans are required to collaborate in conducting FSRs and MRRs. On a county-by-county basis, the plans cooperatively determine which plan is responsible for performing a single audit of a PCP and administering a CAP when necessary. The responsible plan shares the audit results and CAP with the other participating health plans to avoid redundancy.

DHCS reviews the results of Health Net's site reviews and may also audit a random sample of provider offices to ensure that they meet DHCS standards. Detailed information about audit criteria, compliance standards, scoring, and CAPs is available in the Provider Library at providerlibrary.healthnetcalifornia.com. Then select *Quality Improvement > Facility Site Review*.

Physical accessibility review surveys

A component of the FSR is the Physical Accessibility Review Survey (PARS). PARS is conducted for PCPs, high-volume specialists, ancillary providers, community-based adult services (CBAS) providers, and hospitals. Based on the outcome of PARS, each PCP, high-volume specialist, ancillary, CBAS, or hospital provider site is designated as having basic or limited access along with the six specific accessibility indicator designations for parking, exterior building, interior building, restrooms, examination rooms and medical equipment (accessible weight scales and adjustable examination tables).

- Basic access demonstrates facility site access for members with disabilities to parking, building access, elevator, physician's office, examination rooms and restrooms.
- Limited access demonstrates facility site access for members with disabilities as missing or incomplete in one or more features for parking, building access, elevator, physician's office, examination rooms and restrooms.

Results of PARS are made available in the provider directory, health plan website and to Health Net's Medi-Cal Member Services Department to assist members with selecting a PCP who can best serve their health care needs.

Utilization management

To determine medical appropriateness, Health Net uses recognized guidelines and criteria sets that are clearly documented, based on sound clinical evidence and include procedures for applying criteria based on the needs of individual Health Net members and characteristics of the local delivery systems. For the Medi-Cal program, Health Net uses the following criteria:

- Title 22 of the California Code of Regulations (CCR).
- Medi-Cal Managed Care Division (MMCD) policy letters.

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- DHCS Manual of Criteria for Medi-Cal Authorization.
 - DHCS Medi-Cal Provider Manuals.
 - Health Net’s Medi-Cal contract with DHCS.
 - Centene clinical policies and Health Net medical policies. If no plan-specific clinical policy exists, then nationally recognized decision support tools such as InterQual® Clinical Decision Support Criteria or MCG (formerly Milliman Care Guidelines®) criteria are used.

Additional information that the applicable Health Plan Medical Director will consider, when available, includes:

- Reports from peer reviewed medical literature, where a higher level of evidence and study quality is more strongly considered in determinations.
- Professional standards of safety and effectiveness recognized in the U.S. for diagnosis, care, or treatment.
- Nationally recognized drug compendia resources such as Facts & Comparisons®, DRUGDEX®, and The National Comprehensive Cancer Network® (NCCN®) Guidelines.
- Medical association publications.
- Government-funded or independent entities that assess and report on clinical care decisions and technology such as Agency for Healthcare Research and Quality (AHRQ), Hayes Technology Assessment, Up-To-Date, Cochrane Reviews, and the National Institute for Health and Care Excellence (NICE).
- Published expert opinions.
- Opinion of health professionals in the area of specialty involved.

When a decision results in a denial, the criteria used to arrive at the determination are identified in the denial letter. Each denial letter explains Health Net’s appeal process. A Health Net physician reviewer is available to discuss denial decisions. Copies of specific Health Net criteria are available on request by contacting the Health Net Medi-Cal Provider Services Center at 800-675-6110. Participating providers contracting with a Health Net-delegated PPG may also contact the PPG’s utilization management (UM) department for the UM criteria.

Under California Health & Safety Code Section 1367(g), medical decisions regarding the nature and level of care to be provided to members, including the decision of who renders the service (for example, PCP instead of specialist, or in-network provider instead of out-of-network provider), must be made by qualified medical providers, unhindered by fiscal or administrative concerns.

Providers may contact Health Net’s UM staff through the Health Net Medi-Cal Provider Services Center at 800-675-6110. Providers must contact PPG UM staff through the PPG.

UM decisions are based only on appropriateness of care, service and existence of coverage. Health Net does not specifically reward participating providers or other individuals for issuing denials of coverage for care or service. There are no financial incentives for UM decision-makers to encourage decisions that result in underutilization.

Pharmacy management

Health Net pharmaceutical management includes the Health Net *Medi-Cal Preferred Drug List (PDL)* and prior authorization criteria. (previously called the Recommended Drug List (RDL)). This information is available to members and participating providers. The Health Net *Medi-Cal PDL* serves as a reference for physicians to use when prescribing pharmaceutical products for Health Net Medi-Cal members. It provides a comprehensive selection across therapeutic classes. Unlike the state Medi-Cal list of contract medications, the Health Net *Medi-Cal PDL* does not limit prescriptions to six per month. In addition, select over-the-counter (OTC) medications comparable to those approved by DHCS are covered on the Health Net *Medi-Cal PDL*, and generic medications are not limited to selected manufacturers. Providers can access the Health Net *Medi-Cal PDL* online on the provider portal at www.healthnet.com/content/healthnet/

en_us/providers/pharmacy.html. Then select *Medi-Cal Drug List* under *Drug Information for California State Health Programs*.

The Health Net Pharmacy & Therapeutics (P&T) Committee maintains the Health Net *Medi-Cal PDL*. The P&T Committee, which consists of actively practicing pharmacists and practitioners, evaluates the safety profile, effectiveness and affordability of the medications. The medications listed are approved by the U.S. Food and Drug Administration (FDA) and are reviewed by the P&T Committee.

The Health Net *Medi-Cal PDL* is continually reviewed and revised in response to recommendations from participating providers and as new clinical data and medication products become available.

Prescribing practitioners receive communications annually, and when updates occur, which may include:

- A list of pharmaceuticals with restrictions and preferences.
- How to use the pharmaceutical management procedures.
- An explanation of limits or quotas.
- How prescribing practitioners must provide information to support an exception request.
- The process for generic substitution, therapeutic interchange and step-therapy protocols.

In Los Angeles County, providers affiliated with Molina Healthcare, a subcontracting health plan, must use Molina Healthcare's medication formulary when prescribing medications to Health Net members linked to Molina Healthcare PCPs.

Note: Effective January 1, 2022, managed care plan outpatient pharmacy benefits are being carved-out and transitioned to the Medi-Cal FFS program. DHCS has chosen Magellan Medicaid Administration (MMA), Inc. to administer the outpatient FFS pharmacy program. More information about this change will be sent to providers before January 1, 2022.

Rights and responsibilities

Health Net is committed to treating members in a manner that respects their rights, recognizes their specific needs and maintains a mutually respectful relationship. In order to communicate this commitment, Health Net has adopted member rights and responsibilities, which apply to members' relationships with Health Net, its practitioners and providers, and all other health care professionals providing care to its members. Member rights and responsibilities statements are distributed to new practitioners when they join the network and to existing practitioners, if requested.

The member rights and responsibilities are also available in the Medi-Cal Provider Manual in the Provider Library at providerlibrary.healthnetcalifornia.com. Then select *Member Rights and Responsibilities*. You can also get the information by contacting the Health Net Provider Services Center.

Member appeals and grievances

A member or member representative who believes that a determination or application of coverage is incorrect has the right to file an appeal. The appeal must be filed within 60 days of the Notice of Action. Health Net responds to standard appeals within 30 calendar days. A 72-hour appeal resolution is available if waiting could seriously harm the member's health.

Additionally, a Medi-Cal member must go through the plan's internal appeals process before requesting an external state fair hearing and an independent medical review (IMR). Once the internal appeals process has been exhausted, the member may request a state hearing from the California Department of Social Services (DSS) by calling the Public Inquiry and Response Unit at 800-743-8525 (TDD: 800-952-8349), or in writing via mail or secure fax to:

California Department of Social Services
State Hearings Division
PO Box 944243, MS 19-17-37
Sacramento, CA 94244-2430
Fax: 916-651-2789

In addition to the appeal process described above, members may contact the California Department of Managed Health Care (DMHC). However, DMHC requires that grievances must first be addressed with Health Net unless the DMHC decides an expedited review is needed due to uncommon and compelling conditions. DMHC is responsible for regulating health care service plans. DMHC receives complaints and inquiries about health plans via a toll-free number at 888-466-2219 (TDD: 877-688-9891). DMHC's website has complaint forms and instructions online at www.dmhc.ca.gov.

Health Net does not delegate member grievances or appeals. All grievances and appeals should be forwarded immediately to the Health Net Medi-Cal Member Services Department.

Privacy and confidentiality

Health Net members' PHI, whether it is written, oral or electronic, is protected at all times and in all settings. Health Net practitioners and providers can only release PHI without authorization when:

- Needed for payment.
- Necessary for treatment or coordination of care.
- Used for health care operations (including, but not limited to, HEDIS reporting, appeals and grievances, UM, QI, and disease or care management programs).
- Where permitted or required by law.

Any other disclosure of a Health Net member's PHI must have a prior, written member authorization.

Particular care must be taken, as confidential PHI may be disclosed intentionally or unintentionally through many means, such as conversation, computer screen data, faxes or forms. Participating providers must maintain the confidentiality of member information pertaining to the member's access to these services. Health Net requires PPGs to obtain Health Insurance Portability and Accountability Act (HIPAA) Business Associate agreements from people or organizations with which the PPG contracts to provide clinical and administrative services to members.

Special authorization is required for uses and disclosures involving sensitive conditions, such as psychotherapy notes, AIDS or substance abuse. To release a member's PHI regarding sensitive conditions, Health Net participating providers must obtain prior, written authorization from the member (or authorized representative) that states information specific to the sensitive condition may be disclosed.

Interpreter services

Interpreter services are available at no cost to Health Net members and providers without unreasonable delay at all medical points of contact. The member has the right to file a complaint or grievance if linguistic needs are not met.

Provider guidelines

- Providers may not request or require an individual with limited English proficiency (LEP) to provide his or her own interpreter.
- Providers may not rely on staff other than qualified bilingual/multilingual staff to communicate directly with individuals with LEP.
- Providers may not rely on an adult or minor child accompanying an individual with LEP to interpret or facilitate communication.

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- A minor child or an adult accompanying the patient may be used as an interpreter in an emergency involving an imminent threat to the safety or welfare of the individual or the public where there is no qualified interpreter for the individual with LEP immediately available.
 - An accompanying adult may be used to interpret or facilitate communication when the individual with LEP specifically requests that the accompanying adult interpret, the accompanying adult agrees to provide such assistance, and reliance on that adult for such assistance is appropriate under the circumstances.
 - Providers are encouraged to document in the member's medical record the circumstances that resulted in the use of a minor or accompanying adult as an interpreter.

To obtain interpreter services, members and providers can contact the Customer Contact Center at the telephone number located on the member's ID card.

Additional information

A complete copy of Health Net's QI program description is available on request by email at cqi_dsm@healthnet.com. Providers who do not have access to the internet may request print copies of provider materials by contacting the Health Net Medi-Cal Provider Services Center at 800-675-6110, or the Health Net Provider Communications Department via email at provider.communications@healthnet.com.

If you have questions regarding the information contained in this update, or the information or instructions on how to use the services described in this update, contact the Health Net Medi-Cal Provider Services Center at 800-675-6110.

¹ DHCS APL 20-004 (revised) www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2020/APL20-004-Revised.pdf.

² DHCS APL 20-011 (revised) www.dhcs.ca.gov/Documents/COVID-19/APL-20-011-EO-Revision.pdf.

³ DHCS Supplement to APL 19-017 www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2019/APL19-017QISupp.pdf.