



**Department of Health Care Services (DHCS) Tribal and Designees of Indian Health Quarterly Webinar on Proposed Changes to the Medi-Cal Program
February 26, 2021
Questions and Answers**

1. Will the slide deck from the presentation be provided?

DHCS Response: Yes, the slide deck will be available on the DHCS website at the following link: <https://www.dhcs.ca.gov/services/rural/Pages/MeetingandWebinars.aspx>.

2. Who can participate in the 340B program?

DHCS Response: Qualifying non-hospital clinics can participate in the 340B program. Qualifying non-hospital clinics are those actively enrolled as a Medi-Cal clinic provider that is a 340B covered entity pursuant to Section 256b of Title 42 of the United States Code and:

- Licensed under subdivision (a) of Section 1204 of the Health and Safety Code with less than twenty (20%) private pay patients; or
- Licensed under subdivision (a) of Section 1204 that operate in a designated Health Resources Services Administration rural area; or
- Exempt from licensure under subdivision (b) of Section 1206 of the Health and Safety Code (HSC).

The clinic must actively provide a subset of services and must submit an application demonstrating compliance with these requirements.

3. Are tribally operated clinics exempt from licensure under 1206(c) or 1206(b)?

DHCS Response: Tribal health programs are exempt from licensure under HSC 1206(c).

4. What is the start date of the supplemental payment program?

DHCS Response: The start date will coincide with the implementation of Medi-Cal Rx which has been delayed from April 1, 2021. The Department expects to provide additional information on an implementation date in May 2021.

5. What are the services clinics need to provide to qualify?

DHCS Response: To participate in the time-limited 340B supplement payment program under SPA 21-0015, the clinic must actively provide at least 3 of services listed below:

- a. Pharmacy
 - i. Medication management;
 - ii. Clinical pharmacy services;
 - iii. Immunizations/ vaccines;
 - iv. Improving medication compliance;
 - v. Opioid remediation;
 - vi. Patient Assistance Program (especially for patients with Emergency Medi-Cal and prescriptions are not covered)
- b. Patient support services
 - i. Case management;
 - ii. Hard to recruit specialties such as Orthopedics, Urology, Gastroenterology;
 - iii. Care coordination;
 - iv. Disease-state programs, such as Infectious Disease, HIV/AIDS;
 - v. Health Education

6. Are Tribal health clinics exempt from licensure under HSC 1206(c) eligible to participate in the time-limited 340B time-limited supplemental payment program?

DHCS Response: The statute as written does not include clinics exempt from licensure under HSC 1206(c). DHCS welcomes comments regarding this limitation as we finalize the State Plan for submission to CMS.