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**From:** Athena Chapman [REDACTED]  
**Sent:** Wednesday, March 01, 2017 7:39 AM  
**To:** DHCS MCQMD NAU [REDACTED]  
**Cc:** Nau, Nathan (MCQMD)@DHC [REDACTED]; Toyama, Aaron (MCQMD)@DHCS [REDACTED]  
**Subject:** RE: DHCS UPDATE: Medicaid Managed Care Final Rule - Network Adequacy Policy Proposal

I received some additional comments after the deadline. I appreciate your consideration of the following additional comments:

1. Plans to receive CAPs and monetary sanctions for not meeting compliance. Currently Plans are being sent to the Office of Enforcement at DMHC for Timely Access. Proposal implies the DHCS CAPs/sanctions are in addition to DMHC as there is no mention of the DMHC Office of Enforcement. What is the impact to Plans?
2. !ccess currently includes "residence" and "work" regarding the 10/30 or 15/30, proposal only includes "residence". Is "work" being eliminated?
3. Proposal discusses "annual certification". Interested to know what impact this will have on Plans; reporting, submissions, etc. Is the annual DMHC TAR submission going to be a part of this or will this be a new submission? TAR submission has a great impact to the impacted internal departments - coordination of this effort is requested.

**From:** Athena Chapman  
**Sent:** Tuesday, February 28, 2017 2:51 PM  
**To:** [REDACTED]  
**Cc:** Nau, Nathan (MCQMD)@DHCS; [REDACTED]  
**Subject:** RE: DHCS UPDATE: Medicaid Managed Care Final Rule - Network Adequacy Policy Proposal

Dear MCQMD Staff- Attached please find the comment letter from CAHP. Please let me know if you would like to discuss any of the items outlined in this letter.

Thanks,  
Athena Chapman  
Vice President of State Programs  
California Association of Health  
Plans 1415 L Street, Suite 850

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Sacramento, CA 95814

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