



JENNIFER KENT
DIRECTOR

State of California—Health and Human Services Agency
Department of Health Care Services



EDMUND G. BROWN JR.
GOVERNOR

November 29, 2018

Mr. Michael Schrader, CEO
CalOptima
505 City Parkway West
Orange, CA 92868

RE: Department of Health Care Services Medical Audit

Dear Mr. Schrader:

The Department of Health Care Services (DHCS), Audits and Investigations Division conducted an on-site Medical Audit of CalOptima, a Managed Care Plan (MCP), from February 26, 2018 through March 7, 2018. The survey covered the period of February 1, 2017 through January 31, 2018.

On November 5, 2018, the MCP provided DHCS with its Corrective Action Plan (CAP) in response to the report originally issued on October 8, 2018.

All items have been reviewed and DHCS accepts the MCP's submitted CAP. The CAP is hereby closed. Full implementation of the CAP will be monitored on the subsequent audit. The enclosed report will serve as DHCS' final response to the MCP's CAP.

Please be advised that in accordance with Health & Safety Code Section 1380(h) and the Public Records Act, the final report will become a public document and will be made available on the DHCS website and to the public upon request.

If you have any questions, feel free to contact me at (916) 345-7831 or Joshua Hunter at (916) 345-7830.

Page 2

Sincerely,

Hannah Robins, Chief
Compliance Unit

Enclosures: Attachment A CAP Response Form

cc: Gabriel Pacheco, Contract Manager
Department of Health Care Services
Medi-Cal Managed Care Division
P.O. Box 997413, MS 4408
Sacramento, CA 95899-7413

**ATTACHMENT A
Corrective Action Plan Response Form**



Plan: CalOptima

Audit Type: Medical Audit and State Supported Services

Review Period: 2/1/17 – 1/31/18

MCPs are required to provide a CAP and respond to all documented deficiencies within 30 calendar days, unless an alternative timeframe is indicated in the letter. MCPs are required to submit the CAP via email in word format which will reduce turnaround time for DHCS to complete its review.

The CAP submission must include a written statement identifying the deficiency and describing the plan of action taken to correct the deficiency, and the operational results of that action. For deficiencies that require long term corrective action or a period of time longer than 30 days to remedy or operationalize, the MCP must demonstrate it has taken remedial action and is making progress toward achieving an acceptable level of compliance. The MCP will be required to include the date when full compliance is expected to be achieved.

DHCS will maintain close communication with the MCP throughout the CAP process and provide technical assistance to ensure the MCP provides sufficient documentation to correct deficiencies. Depending on the volume and complexity of deficiencies identified, DHCS may require the MCP to provide weekly updates, as applicable.

Deficiency Number and Finding	Action Taken	Supporting Documentation	Implementation Date* <small>(*anticipated or completed)</small>	DHCS Comments
2. Case Management and Coordination of Care				
2.6.1: Update and implement policies and procedure to ensure that the provision of BHT services comply with All Plan Letter 15-025 requirements for a complete behavioral treatment plan.	<p>In response to the identified deficiency, the Plan respectfully submits the following actions and timeline.</p> <p>April 2018: The Plan developed and implemented two Behavioral Health Treatment (BHT) templates:</p> <ul style="list-style-type: none"> • Functional Behavior Assessment (Initial Treatment Plan) (Attachment 1), and • Progress Report (Ongoing Treatment Plan) (Attachment 2). <p>The plan has developed both templates to ensure all behavioral treatment plans meet All Plan Letter</p>	2.6.1_Attachment 1_Functional Behavior Assessment Template 2.6.1_Attachment 2_Progress Report Template	November 1, 2018	<p>11/05/18 - The following documentation supports the MCP's efforts to correct this finding:</p> <p>- Functional Behavior Assessment Template and Progress Report Template submitted by the MCP contain all elements of behavioral treatment plans required in APL 18-006 including crisis and transition plans.</p>

Deficiency Number and Finding	Action Taken	Supporting Documentation	Implementation Date* (*anticipated or completed)	DHCS Comments
	<p>(APL) 18-006 (supersede APL 15-025) requirements.</p> <p>April 17, 2018: The Plan electronically distributed both templates to all BHT providers and provided an orientation to BHT Providers, which included a review of the new templates at the ABA Transition Council webinar (Attachment 3). The Plan also updated the BHT FAQ (Attachment 4) and has posted it on CalOptima's website (Attachment 5).</p> <p>September 6, 2018: CalOptima Board of Directors approved CalOptima Policy GG.1548: Authorization of BHT Services (GG.1548) (Attachment 6). The policy has been updated to state that prior authorization (PA) requests for BHT services shall include a member-specific behavioral treatment plan using the CalOptima-approved template. Every treatment plan is reviewed by a CalOptima reviewer to ensure all requirements are met prior to authorization approval. GG.1548 is currently with the DHCS for review and approval; CalOptima anticipates a response by December 9, 2018. Once the approval is received the policy will be finalized and posted to CalOptima's website.</p> <p>September 20, 2018: The Plan trained the staff responsible for reviewing behavioral treatment plans on the updates made to CalOptima Policy GG.1548. (Attachment 7 & Attachment 8)</p> <p>November 1, 2018: The Plan has updated the BHT script (Attachment 9) in the Utilization Management module of the Medical Management system (Guiding Care) to ensure that all treatment</p>	<p>2.6.1_Attachment 3_ABA Transition Council Webinar_4.17.18</p> <p>2.6.1_Attachment 4_CalOptima BHT FAQs</p> <p>2.6.1_Attachment 5_CalOptima Website - FAQ posting</p> <p>2.6.1_Attachment 6_CalOptima Policy GG.1548 Authorization of BHT Services</p> <p>2.6.1_Attachment 7_Staff meeting Agenda_09.20.18</p> <p>2.6.1_Attachment 8_Training Sign in sheet_09.20.18</p> <p>2.6.1_Attachment 9_Guiding Care BHT Script</p>		<p>- ABA Transition Council Webinar 4/17/18 serves as evidence that the new templates were introduced and discussed with BHT providers.</p> <p>- Applied Behavioral Analysis (ABA) Providers FAQ and CalOptima website screen capture with ABA FAQ posting serves as additional evidence of instructing BHT providers on the use of the new templates and ensuring behavioral health treatment plans meet the standards of APL 18-006.</p> <p>- Policy GG.1548 was updated to require the use of the CalOptima approved template for the development of member specific behavioral treatment plans.</p> <p>- Sign-in sheet and agenda from the 9/20/18 ABA Staff serve as evidence that the staff who reviews behavioral treatment plans have been trained on the updates to</p>

Deficiency Number and Finding	Action Taken	Supporting Documentation	Implementation Date* (*anticipated or completed)	DHCS Comments
	plans requirements are captured during the PA review process.			<p>policy GG.1548 and the PR and FBA templates.</p> <p>- BHT Script has been updated by the MCP to ensure that all elements of the treatment plan are present. Script is used during the review process.</p> <p>This finding is closed.</p>

Submitted by: Signature on File
Title: Chief Executive Officer

Date: 11/2/2018