



Provider Advisory Committee (PAC)

Regular Meeting

Tuesday, December 8, 2020, 7:30 a.m.

Gold Coast Health Plan, 711 East Daily Drive, Community Room, Camarillo, CA 93010

Executive Order N-25-20

Conference Call Number: 1-805-324-7279

Conference ID Number: 497 940 147#

AGENDA

CALL TO ORDER

ROLL CALL

PUBLIC COMMENT

The public has the opportunity to address Ventura County Medi-Cal Managed Care Commission (VCMCC) doing business as Gold Coast Health Plan (GCHP) on the agenda. Persons wishing to address VCMCC should complete and submit a Speaker Card.

Persons wishing to address VCMCC are limited to three (3) minutes unless the Chair of the Commission extends time for good cause shown. Comments regarding items not on the agenda must be within the subject matter jurisdiction of the Commission.

Members of the public may call in, using the numbers above, or can submit public comments to the Committee via email by sending an email to ask@goldchp.org. If members of the public want to speak on a particular agenda item, please identify the agenda item number. Public comments submitted by email should be under 300 words.

CONSENT

1. Approval of Provider Advisory Committee (PAC) Minutes

Staff: Maddie Gutierrez, MMC – Clerk to the Commission
Deborah Munday, Executive Assistant / Assistant Clerk

RECOMMENDATION: Approve the minutes.

2. Approval of the 2021 Provider Advisory Committee Meeting Calendar.

Staff: Maddie Gutierrez, MMC – Clerk to the Commission
Deborah Munday, Executive Assistant / Assistant Clerk

RECOMMENDATION: Approve the 2021 Provider Advisory Committee meeting calendar as presented.

UPDATES

3. State Health Policy Update

Staff: Marlen Torres, Executive Director of Strategy & External

Affairs RECOMMENDATION: Receive and file the update.

4. Solvency Action Plan Update

Staff: Kashina Bishop, Chief Financial Officer

RECOMMENDATION: Receive and file the update.

5. Medi-Cal Rx Update

Staff: Nancy Wharfield, M.D., Chief Medical Officer
Anne Freese, PharmD., Pharmacy Director

RECOMMENDATION: Receive and file the update.

6. System Conversion Update

Staff: Debbie Rieger, Senior Executive, Business Transformation ETP Project

RECOMMENDATION: Receive and file the update.

COMMENTS FROM COMMITTEE MEMBERS

ADJOURNMENT

Unless otherwise determined by the PAC, the next regular PAC meeting will be held on March 9, 2021 at Gold Coast Health Plan at 711 E. Daily Drive, Suite 106, Community Room, Camarillo, CA 93010.

Administrative Reports relating to this agenda are available at 711 East Daily Drive, Suite #106, Camarillo, California, during normal business hours and on <http://goldcoasthealthplan.org>. Materials related to an agenda item submitted to the Committee after distribution of the agenda packet are available for public review during normal business hours at the office of the Secretary of the Committee.

In compliance with the Americans with Disabilities Act, if you need assistance to participate in this meeting, please contact (805) 437-5512. Notification for accommodation must be made by the Monday prior to the meeting by 1:00 p.m. to enable GCHP to make reasonable arrangements for accessibility to this meeting.

AGENDA ITEM NO. 1

TO: Provider Advisory Committee
FROM: Maddie Gutierrez, MMC - Clerk to the Commission
DATE: December 8, 2020
SUBJECT: Approval of the Provider Advisory Committee Meeting Regular Minutes of September 8, 2020.

RECOMMENDATION:

Approve the minutes.

ATTACHMENTS:

Copy of the September 8, 2020 Provider Advisory Committee regular meeting minutes.



**Ventura County Medi-Cal Managed Care Commission (VCMCC)
dba Gold Coast Health Plan (GCHP)
Provider Advisory Committee
September 8, 2020**

CALL TO ORDER

Committee Chair David Fein, called the virtual meeting to order at 7:32 a.m., in the Community Room located at Gold Coast Health Plan, 711 E. Daily Drive, Camarillo, California. He thanked all for participating in the quarterly Provider Advisory Committee meeting.

Marlen Torres, Exec. Director of Strategy & External Affairs noted Steve Peiser, Sr. Director of Network Management, was not in attendance and she would be taking on his meeting duties during his absence.

The following GCHP staff was on the conference call:

- Margaret Tatar, Chief Executive Officer
- Nancy Wharfield, M.D., Chief Medical Officer
- Ted Bagley, Chief Diversity Officer
- Kashina Bishop, Chief Financial Officer
- Eileen Moscaritolo, HMA Consultant
- Marlen Torres, Exec. Director of Strategy & External Affairs
- Robert Franco, Interim Compliance Director
- Pauline Preciado, Sr. Director of Population Health
- Anne Freese, PharmD., Director of Pharmacy
- Vicki Wrihster, Contracting Manager
- Bryan Quijada, Community Relations Specialist

ROLL CALL

Present: Committee members Masood Babeian, Linda Baker, David A. Fein, Will Garand and Katy Krul.

Absent: Sim Mandelbaum, Pablo Velez and Joan Buck-Plassmeyer.

Committee member Pablo Velez joined the meeting at 7:35 a.m.

PUBLIC COMMENT

None.

CONSENT

1. Approval of Provider Advisory Committee (PAC) Minutes for June 9, 2020.

Staff: Maddie Gutierrez, MC, Clerk to the Commission

RECOMMENDATION: Approve the minutes.

Committee member Masood Babeian motioned to approve the minutes. Committee member Katy Krul seconded.

Roll Call Vote:

AYES: Committee members Masood Babeian, Linda Baker, David A. Fein, Will Garand, Katy Krul, and Pablo Velez.

NOES: None.

ABSENT: Sim Mandelbaum and Joan Buck-Plassmeyer.

Committee Chair David Fein declared the motion carried.

UPDATES

2. State Update

Staff: Margaret Tatar, Chief Executive Officer

RECOMMENDATION: Receive and file the update.

Chief Executive Officer, Margaret Tatar reviewed the State Update PowerPoint. The presentation targeted the Long-Term Care at Home Proposed benefit and the 1115 Waiver Renewal.

CEO Tatar stated the following benefits will be maintained: Optional Expansion Benefits which include podiatry, optometry and physical therapy along with the Diabetes Prevention Program, CBAS and Multipurpose Senior Services Program. Proposition 56 will also be maintained. CEO Tatar reminded all that CalAIM implementation has been delayed.

CEO Tatar reviewed LTC benefit highlights. She also noted that DHCS is no longer pursuing implementing this benefit.

The 1115 Waiver Renewal expires at the end of 2020. There is a current 1-year extension of the waiver which has various programs under it. The table in the PowerPoint gave a full scope of the 1115 Waiver. Programs, descriptions and financing information as listed were reviewed. The timeline was also reviewed. Information included waiver extension request, the public comment time period and all other documentation will be posted on the DHCS website. Public hearing dates were also listed.

Committee member Katie Krul asked if there was a possibility of the waiver being pulled. CEO Tatar stated she did not believe there were too many reasons given for pulling the benefit. Exec. Director of Strategy & External Affairs, Marlen Torres, stated that as of now, legislature did not come to terms on how to move forward. CEO Tatar stated the design of the benefit was a sound one.

3. Rx Transition Update

Staff: Nancy Wharfield, M.D., Chief Medical Officer
Anne Freese, PharmD, Director of Pharmacy

RECOMMENDATION: Receive and file the update.

Chief Medical Officer, Nancy Wharfield, M.D., introduced Dr. Anne Freese, Director of Pharmacy. In the PowerPoint Dr. Freese will be presenting she will review claim responsibilities, prior authorizations and appeals, the transition benefit as well as provider communication and training and member communication.

Dr. Freese reviewed the outbound call campaign which will be implemented to get information out to members in the community. Dr. Freese also reviewed the Medi-Cal Rx definition. On January 1, 2021 all retail pharmacy claims will be billed to the state and not GCHP. Dr. Freese reviewed claim responsibilities as well as post transition responsibilities, denial and appeal processes.

Communication will continue as it is received by the State. There is an on-line training for providers. GCHP will give the providers updates through the GCHP website. Member communication will begin in October, a second communication in November and again in December. New ID cards will be issued January 2021. Dr. Freese did present information to the CAC (Community Advisory Committee) and received feedback which she forwarded to the State. Dr. Freese noted the Medi-Cal Rx web portal is live now.

Committee Chair, David Fein stated pharmacy products billed through PBM seem straight forward, understanding is that the State has asked that we check with health plans on how to bill for formula. Dr. Freese responded that it depends on who is providing the prescription and how it comes to GCHP. Pharmacy will bill the State.

Committee member, Pablo Velez asked about the denial process. When there is a denial and it is going through the State process, is it denied until the hearing? Dr. Freese stated it is denied until the State hearing and a decision is made. Committee member, Linda Baker asked what happens if the drug is urgent. Dr. Freese stated an emergency hearing must be requested, but she will investigate, and provide more information.

4. Solvency Action Plan (SAP) Update

Staff: Kashina Bishop, Chief Financial Officer

RECOMMENDATION: Receive and file the update.

Chief Financial Officer, Kashina Bishop, reviewed the Solvency Action Plan (SAP) PowerPoint. She gave an initiative update and identified risks and challenges for the upcoming quarter. The TNE requirements and impact forecasts were reviewed. CFO Bishop also reviewed the phase approach and actions taken as well as annualized impact in savings.

Committee Chair, Dave Fein, asked how the PAC can help and support GCHP. CFO Bishop stated input is welcome. We need to make changes and minimally impact providers and members.

Committee member Linda Baker motioned to approve the Agenda Item Updates 2 through 4. Committee member Pablo Velez seconded.

Roll Call Vote:

AYES: Committee members Masood Babeian, Linda Baker, David A. Fein, Will Garand, Katy Krul, and Pablo Velez.

NOES: None.

ABSENT: Sim Mandelbaum and Joan Buck-Plassmeyer.

Committee Chair David Fein declared the motion carried.

PRESENTATIONS

5. Provider Resource Guide

Staff: Vicki Wrihster, Contracting Manager
Eileen Moscaritolo, HMA Consultant

RECOMMENDATION: Receive and file the presentation.

Ms. Wrihster, Contracts Manager, reviewed the draft Provider Resource Guide. She thanked committee members for their comments and the questions submitted on the implementation process. This guide is still being reviewed internally. She noted there will be changes to the provider portal. Provider ID numbers are being reviewed internally. Member ID numbers will not change. She encouraged teams to attend webinars and trainings. The provider implementation will take place 11/7/2020. Providers will see the changes from this date moving forward.

Ms. Wrihster noted the draft is being updated as new information is received. She is requesting the committee review the draft and provide feedback.

Committee member Linda Baker motioned to approve Agenda Item 5, Provider Resource Guide presentation. Committee member Pablo Velez seconded.

Roll Call Vote:

AYES: Committee members Masood Babeian, Linda Baker, David A. Fein, Will Garand, Katy Krul, and Pablo Velez.

NOES: None.

ABSENT: Sim Mandelbaum and Joan Buck-Plassmeyer.

Committee Chair David Fein declared the motion carried.

ROUNDTABLE/DISCUSSION

Committee Chair, David Fein, requested the Clerk schedule a subcommittee meeting with CEO Tatar, CFO Bishop and Marlen Torres, Exec. Director of Strategy & External Affairs to discuss tangible output and a presentation to the Commission.

ADJOURNMENT

With no further items to be addressed, Committee Chair, David Fein motioned to adjourn the meeting. Committee member Linda Baker seconded.

The meeting was adjourned at 9:01 A.M.

Approved:

Maddie Gutierrez, MMC
Clerk to the Commission

AGENDA ITEM NO. 2

TO: Provider Advisory Committee
FROM: Maddie Gutierrez, MMC - Clerk to the Commission
DATE: December 8, 2020
SUBJECT: Approval of the 2021 Provider Advisory Committee Meeting Calendar.

SUMMARY:

To establish the Provider Advisory Committee (PAC) meeting dates for the 2021 calendar year.

RECOMMENDATION:

Approve the 2021 Provider Advisory Committee (PAC) calendar as presented.

ATTACHMENTS:

Copy of the 2021 Provider Advisory Committee meeting calendar.



2021

Provider Advisory Committee Meetings

PAC Meeting
7:30AM - 9:00AM

January						
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31						

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December						
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AGENDA ITEM NO. 3

TO: Provider Advisory Committee

FROM: Marlen Torres, Executive Director, Strategy and External Affairs

DATE: December 08, 2020

SUBJECT: State Health Policy Update

POWERPOINT PRESENTATION

RECOMMENDATION:

Receive and file the update.

ATTACHMENT:

State Policy Update, December 08, 2020 -PPT Presentation

State Policy Update

December 08, 2020

Marlen Torres, Executive Director
Strategy & External Affairs

Integrity

Accountability

Collaboration

Trust

Respect

Agenda

1. 2021 Federal Outlook
2. 2021 Legislative Priorities
3. State Budget Update
4. Legislative Analysts Office Fiscal Outlook
5. COVID-19 Vaccine Update

2021 Federal Outlook: Biden Administration and CA

1. Look for near term waiver negotiations between CA and Biden Administration
2. Look for CA revenue estimates – early estimates are favorable
3. Look for CA to focus on the following in 2021:
 - a. Enhanced case management (and the need for plans to work with counties on equitable revenue in plan rates to continue WPC payments.
 - b. In lieu of services (ILOS) policy
 - c. Renewed focus on BHI
 - d. Renewed duals policy

2021 California Legislative Priorities

- ▶ Telehealth
 - This year's telehealth bills that went to the Governor's desk were vetoed, we anticipate legislation will be introduced which will address the telehealth priorities of providers and advocates by codifying the COVID-19 telehealth flexibilities. Specifically, we expect the following issues will be included in legislation:
 - a. Provider and advocate telehealth priorities include:
 - b. Recognizing FQHC telehealth services as PPS billable visits
 - c. Requiring payment parity in Medi-Cal (already required for commercial plans)
 - d. Allowing reimbursement for telephonic/audio-only care, in addition to audiovisual telehealth services
 - e. Allowing FQHCs to establish patients via telehealth
 - There may also be a telehealth proposal from the Administration, as the Governor's veto messages indicate that DHCS is evaluating the existing telehealth policies to determine which flexibilities should be available post-pandemic.

2021 California Legislative Priorities (cont.)

- ▶ **Affordable Care Act**
 - Depending on the outcomes of the Supreme Court decision on the ACA and the presidential election, the ACA may be the subject of state-level legislation.
 - The Administration will explore the impact of the ACA in California and its legal challenges at the federal level. Consumer groups, public hospitals, and providers will also testify.
- ▶ **Data Sharing and (Health Information Exchange) HIEs**
 - The Legislature is exploring data sharing and a statewide HIE and will begin convening hearings regarding the topic.

State Budget Update

- ▶ While revenue for the first several months of the fiscal year is above what was projected in the State Budget, it is still a drastically different financial outlook than the Governor's Budget in January 2020 which forecast a \$6 billion budget surplus.
- ▶ In addition, the October 15th deadline for the budget trigger solutions passed last week without additional federal funding.
- ▶ Given the lack of another stimulus package, budget spending reductions or deferrals totaling over \$11 billion will not be triggered off and will remain in this year's budget.
- ▶ Note that while early in the Budget process, the Governor proposed certain Medi-Cal services and programs be included in the trigger cuts, the final budget ultimately spared any cuts to health.

State Budget Update(cont.)

- ▶ See below for the list of 2020-21 deferrals and reductions:
 - Education-related deferrals
 - Employee compensation reductions
 - Higher education reductions
 - Special fund loans
 - Realignment backfill
 - Judicial branch reduction
 - Other reductions and reversions (teaching grants, child support agency, moderate-income housing)
- ▶ If federal funding does not materialize or if Congress passes a pared back stimulus package, we expect such spending reductions to continue in next year's budget.
- ▶ The Legislature may also bring back ideas for state-level solutions like the joint economic stimulus plan put forward by the Legislature this summer.

Fiscal Outlook FY 2020-21 from the Legislative Analyst Office

- ▶ Between 2020-21 and 2021-22, the caseload to grow from 13.8 million enrollees to 14.9 million—an increase of 8 percent, or 1.1 million beneficiaries.
- ▶ Revised caseload projections save \$320 million General Fund in 2019-20 and nearly \$870 million General Fund in 2020-21 relative to budget act assumptions.
- ▶ Project the COVID-19 vaccination costs will be minimal in 2020-21 and, instead, to peak in 2021-22 at around \$140 million General Fund.

Fiscal Outlook FY 2020-21 from the Legislative Analyst Office (cont.)

- ▶ Assume the expiration of the national COVID-19 public health emergency, we assume that enhanced federal funding under the pandemic will expire in December 2021.
- ▶ The Medi-Cal items subject to suspension are
 - ▶ Most Proposition 56-funded provider payment increases
 - ▶ The extension of coverage for postpartum mental health
 - ▶ The restoration of previously eliminated optional benefits
 - ▶ The expansion of screening and intervention to drugs other than alcohol. suspensions do not take effect.

COVID-19 Vaccine

- ▶ California has various taskforces focused on vaccine
 - ▶ Community Vaccine Advisory Committee
 - ▶ Scientific Safety Review Workgroup
 - ▶ Drafting Guidelines Workgroup
- ▶ Guidance to administered needed as there is a limited supply
 - ▶ Important to review existing recommendations
 - ▶ Need to ensure equity by carefully defining the groups of individuals who will be eligible for the vaccine as additional supply arrives
- ▶ Priority given to Health Care Workers and Medical First Responders

Questions

AGENDA ITEM NO. 4

TO: Provider Advisory Committee
FROM: Kashina Bishop, Chief Financial Officer
DATE: December 08, 2020
SUBJECT: Progress Report: Solvency Action Plan

POWERPOINT PRESENTATION

RECOMMENDATION:

Receive and file the update.

ATTACHMENT:

Progress Report: Solvency Action Plan, December 08, 2020 -PPT Presentation

Progress Report: Solvency Action Plan

December 8, 2020

Kashina Bishop
Chief Financial Officer

Agenda:

1. Background:
 - a. Required Tangible Net Equity (TNE)
 - b. Comparison to California Public Plans
 - c. State Budget and financial implications
2. Solvency Action Plan – Initiative Update
3. Identify risks and challenges for the upcoming quarter relating to ongoing progress for Solvency Action Plan
4. Questions and comments

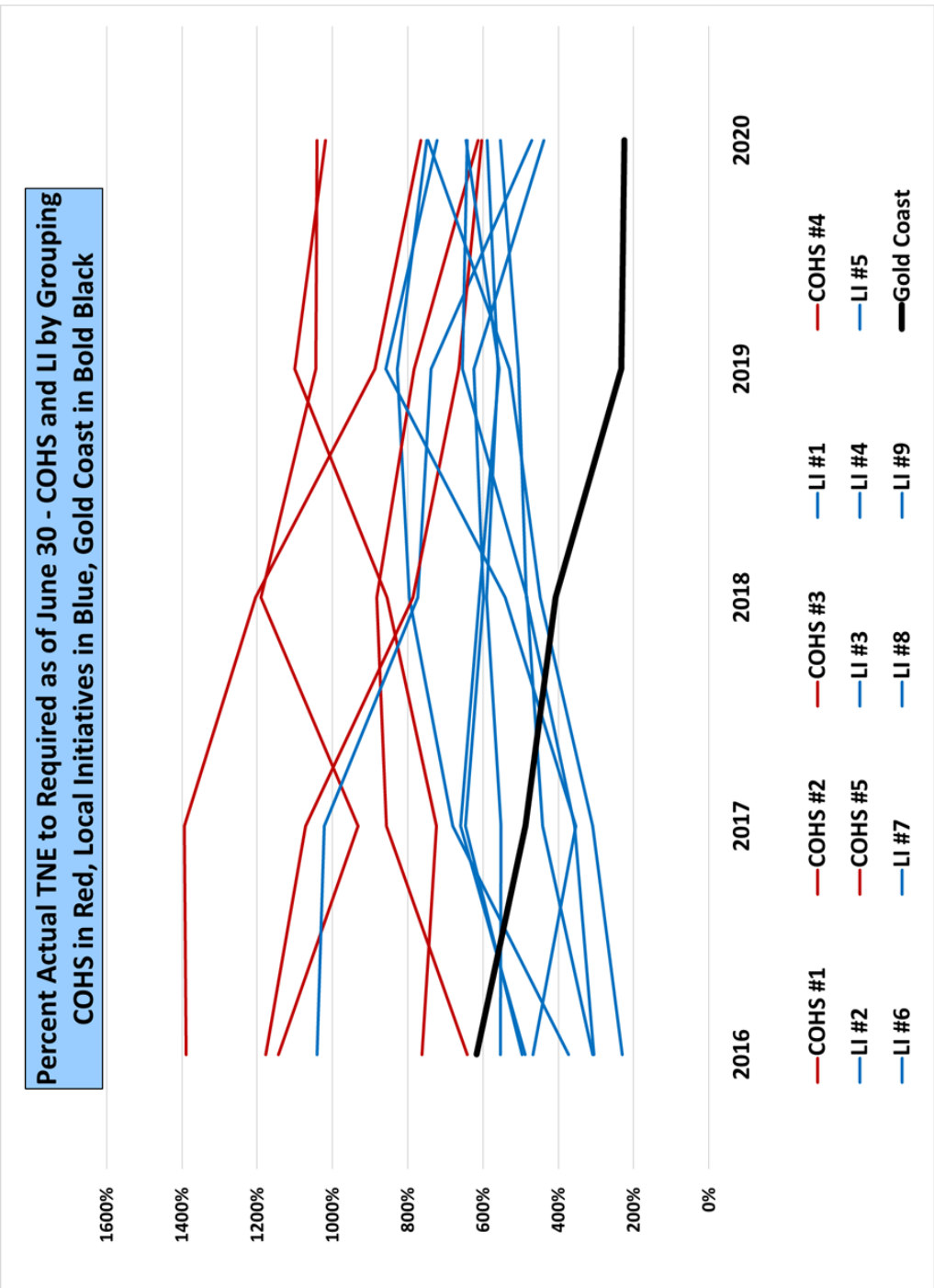
Background:

Tangible Net Equity Requirements

1. TNE is a health plan's total assets minus total liabilities reduced by the value of intangible assets and unsecured obligations of officers, directors, owners, or affiliates outside of normal course of business.
2. Required TNE for a plan is the greater of 1 million dollars or a % of premium revenues or a % of healthcare expenses.
3. Excess TNE is the difference between total TNE and required TNE.

Background:

GCHP Outlier Status Among Public Plan



Background:

Financial Implications of State Budget

As a response to the public health emergency and the negative economic consequences to California, budget proposals include managed care rate reductions and program efficiencies.

1. 1.5% rate reduction retroactive to July 1, 2019 (\$8.5 million)
2. Increase of 10% to Long Term Care facility rate effective March 1, 2020 through the emergency (FYTD Through October - \$3.5 million)
3. Efficiency and acuity adjustments to upcoming rate year beginning January 1, 2021 (\$8+ million)

Update: Solvency Actions - June to October 2020

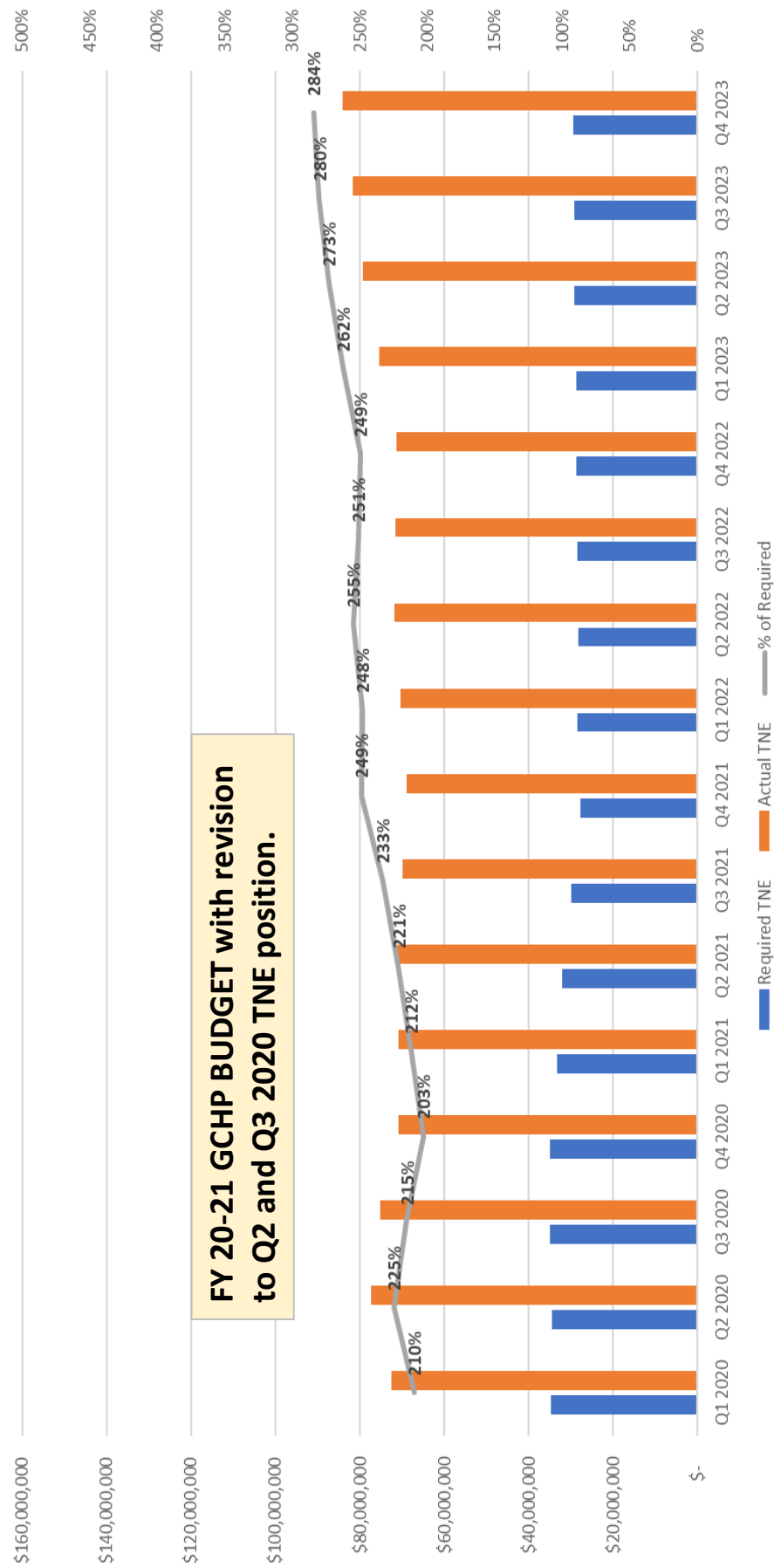
Actions
1. Reduction of LTC facility rates to 100% of Medi-Cal rate
2. Reduced Adult Expansion PCP rates
3. Revised Non-Pharmacy Dispensing Site Policy
4. Reduced rates to tertiary hospital
5. Administrative expense budget reductions

TOTAL ESTIMATED ANNUAL SAVINGS IS \$10-11 MILLION

Current Forecast: FY 2020-21 GCHP Budget

Tangible Net Equity
3 Year Forecast

FY 20-21 GCHP BUDGET with revision to Q2 and Q3 2020 TNE position.



Next steps - Phase 2: Solvency Action Plan

**PROVIDER RATE/CONTRACT CHANGES ON HOLD
THROUGH THE SYSTEM CONVERSION**

GCHP remains committed to preparation and
planning for CY 2021

Next steps - Phase 2: Solvency Action Plan

Current Focus - includes but not limited to	Estimated Annualized \$ Savings
Outlier contract rates	TBD
Improved contract language	TBD
Expansion of capitation arrangements	Required TNE and risk reductions
LANE/HPCPS analysis	TBD
Consideration of across the board reductions	TBD

Next steps - Phase 2: Solvency Action Plan Planning and Preparation

1. Outlier rate analysis
2. Contract reviews
3. Input from the Provider Advisory Committee
4. Financial analysis

Solvency Action Plan – risks and challenges:

1. Coordination with system conversion
2. Provider acceptance of rate decreases and potential impact to network
3. Unknown impact to medical expense with the pandemic
4. Extent of further CY 2021 capitation rate adjustments

Questions?

AGENDA ITEM NO. 5

TO: Provider Advisory Committee
FROM: Nancy Wharfield, M.D., Chief Medical Officer
Anne Freese, PharmD, Director of Pharmacy
DATE: December 8, 2020
SUBJECT: Medi-Cal Rx Update

SUMMARY:

Presentation describing the upcoming implementation date change for Medi-Cal Rx to April 1, 2021.

RECOMMENDATION:

Staff recommends that the Provider Advisory Committee accept and file the presentation.

ATTACHMENT:

- 1) Freese, A., (2020). Director of Pharmacy, Medi-Cal Rx, Presentation Slides.

Medi-Cal Rx

December 08, 2020

**Annie Freese, Pharm.D.
Director of Pharmacy**

Agenda

- Medi-Cal Rx Implementation Extension
- Member Communication
- Medi-Cal Rx Website
- Important Links
- Questions and Help

Medi-Cal Rx Implementation Extension

New Implementation Date: April 1, 2021

- **DHCS Press Release/Email Subscription Service**
- **GCHP Provider Notice**
- **Beneficiary Notice**

Communication Schedule: Members

Date	Topic	Responsibility
October 2020	90-Day Notice Letter	DHCS
November 2020	60-Day Notice Letter	DHCS
December 2020*	Member Notification of Extension	DHCS
February-March 2021*	Outreach Campaign	GCHP
March 2021*	30-Day Notice Letter	GCHP
April 2021*	New ID Cards	GCHP

**Potential updated communication plan from DHCS expected in the near future*

Medi-Cal Rx Web Portal: NOW LIVE!

<https://medi-calrx.dhcs.ca.gov/home/>

Information Available:

- Program Overview and FAQs
- Training and Communication Schedules
- Details regarding Transition Policy
- Email subscription service alert sign up – **SIGN UP NOW!**

Other Important Links

Medi-Cal Rx Dedicated Transition Website:

[Medi-Cal Rx Transition](#)

Contract Drug List (CDL):

[Medi-Cal Pharmacy Manual](#)

In Summary:

What is Medi-Cal Rx?

- On **April 1, 2021**, all pharmacy claims will be billed to Medi-Cal Rx, the new FFS pharmacy program
- GCHP can assist members and providers, but the benefit will be administered by the state
- The formulary will change under Medi-Cal Rx and members may need new authorizations or to change medications
- There will be a transition 180 day transition period for grandfathering of medications

What Do I Need to Do?

- **Register** for and **access** the Medi-Cal Rx **secure provider portal**
- **Complete** any necessary **training** and education modules to know how to help members access their pharmacy benefits including how to submit a prior authorization or appeal
- **Educate staff** on new phones numbers, web portal, etc.

Medi-Cal Rx: Questions and Help

- For questions and/or comments regarding Medi-Cal Rx, DHCS invites stakeholders to submit those via email to rxcarveout@dhcs.ca.gov
- For questions and/or comments for GCHP regarding pharmacy benefits, please reach out to the pharmacy department at pharmacy@goldchp.org
- For help with the Medi-Cal Rx portal, please reach out to Magellan for assistance: MediCalRxEducationOutreach@magellanhealth.com

AGENDA ITEM NO. 6

TO: Provider Advisory Committee

FROM: Debbie Rieger, Senior Executive, Business Transformation ETP Project

DATE: December 08, 2020

SUBJECT: HSP Medi-Trac Update

POWERPOINT PRESENTATION

RECOMMENDATION:

Receive and file the update.

ATTACHMENT:

HSP Medi-Trac Update, December 08, 2020 -PPT Presentation

Gold Coast Health Plan

HSP Medi-Trac Update

December 8, 2020

Eileen Moscaritolo
HMA Consultant

Debbie Rieger
Senior Executive Business
Transformation Consultant

Integrity

Accountability

Collaboration

Trust

Respect

HSP Medi-Trac Update

- Go/No-Go decision between GCHP and Conduent occurred 11/30/2020
- Go Live moved to Quarter 1 - 2021
- Risk areas
 - Authorizations
 - Financial Accuracy
 - Testing

HSP Medi-Trac Update

- Provider Resources
 - Webinars
 - Gold Coast Website
 - Provider Communications
 - Email for questions: ETPQuestions@goldchp.org