

PROVIDER MEMO

To: Santa Clara Family Health Plan Primary Care Providers
From: Provider Network Operations
Date: November 1, 2022
Subject: All Plan Letter 22-015: Enforcement Actions: Administrative and Monetary Sanctions

Dear Santa Clara Family Health Plan (SCFHP) Contracted Providers and Delegates,

The purpose of this memo is to pass along details on the Department of Health Care Services (DHCS) **All Plan Letter (APL) 22-015** (https://bit.ly/APL_22-015), policy regarding the imposition of administrative and monetary sanctions, which are among enforcement actions DHCS may take to enforce compliance with Managed Care Plans (MCPs) contractual provisions and applicable state and federal laws.

The APL states that the:

“DHCS must enforce compliance with contractual provisions of the DHCS Contracts with MCPs including the requirement to comply with APLs and Policy Letters (PLs) (collectively referred to as “Contractual Obligations”) as well as compliance with applicable state and federal laws and regulations, in accordance with its authority and obligations under state and federal law, and its authority under its Contracts with MCPs.

Policies to enforce compliance include corrective action plans (CAPs), monetary sanctions, non-monetary or administrative sanctions and contract termination.

Where SCFHP may receive determinations and findings due to violations summarized in this APL, SCFHP will apply the same enforcement actions to the provider(s) deemed responsible. By way of example, if SCFHP were to incur a \$15,000 financial penalty due to violations by *Delegated Provider Alpha* defined in APL 22-015, SCFHP would recoup that dollar amount from *Delegated Provider Alpha* to be made whole.

We thank you for taking the time to read this memo and APL 22-015 (https://bit.ly/APL_22-015). This is an important step as the DHCS heightens the expectation that we comply with contractual obligations or applicable state and federal laws and regulations.

Please email ProviderServices@scfhp.com with any questions you may have. Thank you for the valuable care you continue to provide our members.