



**Gold Coast
Health Plan**SM
A Public Entity

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Gold Coast Health Plan

DELEGATION ASSESSMENT & OVERSIGHT PROCESS PLAN

OVERVIEW

Gold Coast Health Plan (GCHP) is committed to conducting its business operations in compliance with ethical standards, contractual obligations under State and Federal Programs, and all applicable laws and, regulations pertaining to the GCHP Compliance Program. This commitment extends to our Network Providers, Subcontractors, and Downstream Subcontractors that support GCHP's mission and vision.

The Delegation Assessment and Oversight Process Plan supports GCHP's Compliance Plan when its health plan operations and other functions are delegated to a subcontractor or downstream subcontractor. This document summarizes the assessment and oversight processes for subcontractors and downstream subcontractors that are performing delegated functions on GCHP's behalf.

This document is intended to be a summary of the delegation assessment and oversight processes. The applicable GCHP policies and procedures will have the necessary information detailing the processes listed below.

DELEGATION ASSESSMENT

As part of the delegation process, GCHP conducts an initial assessment of delegates. GCHP will develop requirements for any proposed new or updated subcontracting arrangement this includes Subcontractors who would be performing delegated health plan functions under the DHCS Medi-Cal contract.

The assessment process will be conducted through existing contracting processes established by the GCHP Procurement Department and/or Provider Network Operations Department. The initial assessment process is conducted by a team of evaluators from a cross section of GCHP that are involved in the business functions being delegated. The evaluation team would review the criteria and scoring of the response and documentation provided by potential subcontractors based upon established GCHP policies and procedures. Each assessment may differentiate on the review criteria per the proposed delegated function under review.

The delegation assessment in the selection process will consider the overall value to GCHP and our Members in the requirements gathered from potential Subcontractors. These value add items can be various depending upon the function and business need that the subcontracting arrangement would address, but the underlying value will be in how the arrangement would add value to the Member experience, quality of care provided to Members, and access to care.

Refer to FI-002 Procurement Policy for more details.

READINESS AUDIT

Prior to the execution and implementation of a subcontracting contract that would include a delegation agreement, a readiness audit is performed by GCHP. The audit evaluates the prospective delegate's ability to perform the delegated functions in accordance with GCHP and DHCS requirements. A written report of the readiness audit is reviewed by the Compliance Committee and a written report is also sent to the Subcontractor under consideration.

Refer to DO-001 Delegation Oversight Subcontracting Arrangements Policy for more details.

AUDITING and MONITORING

The GCHP Compliance Department, in coordination with the Compliance Committee, performs annual audits of delegated business functions to Subcontractors. The audits performed are then reported to the GCHP Compliance Committee and Quality Improvement and Health Equity Committees on a quarterly basis.

Refer to DO-001 Delegation Oversight Subcontracting Arrangements Policy for more details.

Delegate Reporting

Subcontractors and applicable Downstream Subcontractors are subject to ongoing monitoring in accordance with applicable contractual requirements. Delegates are required to submit all reports as defined by each contract. Contractual and other functional reporting is reviewed by the functional business owners.

Oversight of Delegated Activities

GCHP delegates certain functions and/or processes to contracted Medical Groups and sub-contracted full-service or specialty plans who are required to meet all contractual, legal, and regulatory requirements of GCHP's Policies and Procedures and other guidelines applicable to the delegated functions. Detailed delegation agreements are executed with those Delegated Providers and Entities. Periodic reports are monitored by GCHP staff. GCHP provides a New Provider Orientation to provide appropriate trainings related to Medi-Cal and GCHP operations.

Refer to *NO-001 New Provider Orientation Policy* for additional details.

GCHP maintains oversight over all Delegated Providers, including but not limited to, the following delegated activities:

- Provider credentialing and re-credentialing at select facilities.
- Quality Improvement and Health Equity Programs
- Member Services and Call Center Operations
- Utilization Management
- Grievances and Appeals
- Claims Payment

Policies and Procedures

GCHP shares its Policies and Procedures for delegated functions with Subcontractors. To ensure the Subcontractor understands the Policy and Procedure, GCHP may provide communications and trainings in different formats, to include but not limited to: joint operations meetings; relevant committee meetings; direct communication via e-mail or dedicated meetings to address.

Refer to DO-001 Delegation Oversight Subcontracting Arrangements Policy for more details.

The Subcontractor may have the ability to develop their own policies and procedures, which will be outlined in their contract. If allowed to develop proprietary policies and procedures the Subcontractor will need to receive GCHP approval prior to implementation of the policy and procedure. Approval of each policy and procedure is dependent upon the delegated function(s).

Refer to DO-001 Delegation Oversight Subcontracting Arrangements Policy for more details.

Corrective Action Plan(s) (CAPs)

As part of the ongoing monitoring and auditing process GCHP may issue a CAP to a Subcontractor if a deficiency of the contract is identified, GCHP works with the Subcontractor to remediate CAPs as appropriate. As part of the CAP process, GCHP may impose penalties if the subcontractor fails to comply with the requirements of the GCHP Program; penalties will be commensurate with the seriousness of the non-compliance issue.

Refer to DO-002 Sanctions Delegated Subcontractors Policy for additional details.

Document Control

Document Update	Date	Summary
Delegation Assessment and Oversight Process Plan Draft	6/13/2023	Plan drafted for DHCS 2024 Operational Readiness deliverable R.0243.2 and for DHCS 2024 contract requirements.
DHCS Approval	7/20/2023	DHCS approved submission.
Delegation Assessment and Oversight Process Plan moved from Draft to Final	12/21/2023	Delegation Assessment and Oversight Process Plan published.