



March 20, 2020

The Honorable Gavin Newsom
Governor, State of California
State Capitol, Sacramento, CA

Mark Ghaly, MD
Secretary, Health & Human Services Agency
1600 9th Street, Suite 460
Sacramento, CA 95814

Brad Gilbert, MD
Director, Department of Healthcare Services
1501 Capitol Avenue
Sacramento, CA 95814

Michelle Rouillard
Director, Department of Managed Healthcare
980 9th Street, 5th floor
Sacramento, CA 95814

Re: Organized Multispecialty Medical Group and Independent Practice Association response to the COVID-19 pandemic

All:

America's Physician Groups (APG) represents over 165 multispecialty medical groups and independent practice associations across California providing care to over 18 million Californians. Some of our larger members are also organized in other neighboring states as well and thus have cross-state resources. The purpose of this letter is to outline how our members can help to address the COVID-19 pandemic and to identify outstanding issues that impede their ability to do so.

Attached to this letter you will find a list of our 165 California-based physician group members.

Background on our members:

- They are organized networks of primary and specialty care physicians, with clinical and administrative linkages to coordinate patient care, and disseminate information to individual practitioners:
 - Multispecialty Medical Group models operate through clinic locations
 - Independent Practice Associations coordinate a contracted network of independent physicians in individual, small group and specialty medical group practices.
- Most of our members are contracted with several health plans, across Commercial HMO, Medicare and Medi-Cal. Medical Group models are also contracted with PPO plans.
- Most of the California primary care physician and specialty physician workforce is affiliated with our members
- Many of our members currently offer electronic patient portals for secure email communication, online appointment service, access to medical records and some limited video telehealth

How our members can help:

- They can organize patient care, credential providers, build network capacity, and implement telehealth and eConsult to increase access, handle claims payment to other providers, and interact with health plans
- Set up testing centers at the community level
- Develop alternative site locations to maintain non-COVID-19 health care services as hospital beds are consumed by COVID-19 cases
- Expand eConsult networks through existing systems, such as SNC's eConsult network
- Implement patient-facing telehealth access – with the help and coordination with contracted health plan payers
- Rapidly educate network primary care physicians on best clinical practices related to COVID-19 care
- Integrate behavioral health resources into COVID-19 treatment plans
- Provide administrative services infrastructure to facilitate payments between payers and front-line providers
- Onboard needed providers into existing networks, and process credentialing, and re-allocate specialists in areas not immediately needed for COVID-19 treatment to primary care and other functions
- Integrate their physician resources from outside California to increase access to care. Some of our larger members have networks that span the West Coast and the Southwest.

These are the immediate problems and issues that our members are reporting to us:

- **Independent primary care and specialty physician practices are languishing in the current environment** – lacking access to PPE/PPG equipment, testing supplies, training, and organization at the local level. Our members can organize training, provide IT infrastructure and distribute supplies but lack the information and sources to do this at present. They will ultimately be needed to accept referrals from hospitals and FQHC clinics.
- **Independent primary and specialty care practices have financial concerns.** Their regular patient base has dried-up this week due to social-distancing, self-isolation and shelter-in-place orders. They do not have access to protective PPG/PPE gear, or test kits. Many practices report that they are sitting idle this week because patients have stopped coming in. Many small practice physicians are calling for immediate financial stabilization through grants, zero interest loans and other subsidization mechanisms to keep their doors open for the eventual onslaught of patients suffering from COVID-19.
- **Current risk-bearing contracts do not contain pandemic exception clauses to mitigate the sudden and severe impact of the COVID-19 pandemic.** Our members' ability to sustain smaller physician practices through capitation payments is likewise compromised. Our members have been shifted the financial risk for COVID-19 screening, testing and treatment over the past week, and they lack the financial reserves of health plans. Risk-bearing physician organizations will likely not be able to sustain their financial solvency over the long term since existing risk-based payment models do not take pandemic-level risk into account. We suggest an immediate review by the DMHC and DHCS of this concern.

- **Our groups are working to set up specific testing centers**, but they don't have access to PPE/PPG equipment, masks and test kits. We need an efficient approach at the County level to coordinate the development of testing sites and to allocate resources accordingly.
- **There is great confusion at the individual provider level over telehealth directives.** We are working with the California Association of Health Plans, individual plans and the California Telehealth Coalition to get information out to front-line responders on the adoption of telehealth as quickly as possible, but there is great confusion among providers over billing and payment rules for telehealth. This confusion is a barrier to telehealth adoption.

Suggestions for Immediate Consideration:

- **There is confusion among the administrative workforce in healthcare whether Shelter-in-place orders recognize the need for administrative personnel to continue to work** at office locations where utilization management, care coordination, and claims processing functions occur within our physician groups. APG interprets the current directives to apply to administrative personnel, but further clarification of this point would be helpful. APG will commit to communicating any clarification throughout our membership.
- **Please provide further clarification of the DMHC's relaxation of timely claims submission requirements.** The current language that we have seen applies only to health plans, not to delegated physician organizations. It also does not provide relaxation of timely claims payment requirements. Risk-bearing provider organizations require the same level of flexibility as health plans because they are experiencing the same workforce issues. We anticipate timely compliance will be impaired for timely forwarding of misdirected claims, claims submission and payment deadlines, member denials notices (NOA, TAT and IDN), audits and monthly reporting requirements. It is often forgotten that our members are *both* billing providers and paying providers.
- **Relaxation of DMHC enforcement of Risk Bearing Organization financial solvency** TNE standards and corrective action plans should be suspended during the pendency of the COVID-19 pandemic. We recognize the important role that DMHC plays in monitoring the financial health of risk-bearing provider entities, especially during this period of tremendous financial and operational stress on providers. However, the ability of RBOs to provide audited financials may now be impaired as the accounting workforce and outside accounting firms are affected by the virus. It may also become difficult for RBOs to report on existing corrective action plans related to financial solvency.
- **Consider a moratorium on any pending plan-provider contract terminations** during the pendency of the pandemic, or at least 12 months by DHCS and DMHC directive to health plans
- **Relax audit requirements for referral authorizations** to free-up administrative capacity within the delegated physician groups to address clinical staffing needs as staff member illness and absenteeism increases (DHCS and Medi-Cal Managed Care Plans).
- **Relax the implementation of Medi-Cal P4P / HEDIS requirements** to meet 50% MPL set by NCQA for at least 12 months post-pandemic (We note the efforts that DHCS has already taken to secure flexibility for many CMS Medicaid requirements in the two 1135 waiver requests, which if approved will be very helpful

Long-term Policy Considerations to Sustain the Independent PCP Practices and Delegated providers:

- **Primary Care doctors are concerned about their staff and family's well-being if they become ill.** They are requesting access to state-supported disability coverage and survivor's benefits on an immediate basis, since there is no practical means of parsing which healthcare workers are in harm's way, given the immediate needs for teamwork and multi-order effects
- **PCP Access to zero-interest disaster free loans and grants:** <https://disasterloan.sba.gov/ela/>
- **Streamlined classification to access federal funds** allocated for COVID-19 equipment purchases, staffing, etc.

America's Physician Groups has convened both a national and a California advisory group panel to assist with information gathering from the front lines. We will continue to keep you informed of developments as they occur. We want to thank each of you for your excellent leadership, compassion and optimism in this time of crisis. We are all fortunate to be Californians and Americans.

Sincerely,



Bill Barcellona
Executive Vice President for Government Affairs, APG

Please respond to wbarcellona@apg or text/voice at (916) 606-6763

CC:

Tam Ma, Governor's Office
Alice Chen, CHHS
Mary Watanabe, DMHC
Patti Henderson, DHCS

Attachment: List of APG California Provider Groups



APG California Members

Access Medical Group - Advanced Medical Management, Inc.
Accountable Health Care IPA
Adventist Health Physicians Network IPA
Affiliated Doctors of Orange County- Heritage Provider Network
Affinity Medical Group
Agilon Health
Alameda Health Partners
Alamitos IPA
AllCare IPA
Allied Physicians of California
Alpha Care Medical Group- MedPOINT Management
AltaMed Health Services
AMVI/Prospect Medical Group
AppleCare Medical Group, Inc.
Arch Health Medical Group
Bakersfield Family Medical Center - Heritage Provider Network
Beaver Medical Group, L.P.
Bella Vista Medical Group IPA- MedPOINT Management
Brookshire IPA
Brown & Toland Physicians
California Coastal Physician Network - Heritage Provide
California Desert IPA - Heritage Provider Network
California Pacific Physicians Medical Group, Inc.
Canopy Health
CareMore Medical Group
Cedars-Sinai Medical Group
Centinela Valley IPA- MedPOINT Management
Central Valley Medical Group - Sutter Health Foundation & Affiliated Groups
Children's Physicians Medical Group
Chinese Community Health Care Association
Choice Medical Group
Citrus Valley Independent Physicians
Coachella Valley Physicians of PrimeCare, Inc.- NAMM
Coastal Communities Physician Network - Heritage Provider Network
Colorado Health Neighborhoods- Catholic Health Initiatives
CommonSpirit Health
Community Care IPA- Advanced Medical Management, Inc
Conifer Health Solutions
Crown City Medical Group- MedPOINT Management

Desert Oasis Healthcare - Heritage Provider Network
Dignity Health Medical Foundation
Dignity Health Medical Network - Santa Cruz
East Bay Physicians Medical Group - Sutter Health Foundation & Affiliated Groups
Edinger Medical Group
El Proyecto Del Barrio, Inc.- MedPOINT Management
Empire Physicians Medical Group - NAMM
Exceptional Care Medical Group
Facey Medical Foundation
Family Choice Medical Group
Family Health Alliance
Genesis Healthcare of Southern California, Inc., A Medical Group - Prospect
Medical Group
Global Care Medical Group IPA- MedPOINT Management
Good Samaritan Medical Practice Association
Gould Medical Group - Sutter Health Foundation & Affiliated Groups
Graybill Medical Group
Greater Covina Medical Group - Heritage Provider Network
Greater Newport Physicians Medical Group, Inc.
Greater Tri-Cities IPA - Physicians DataTrust
Healthcare Partners Medical Group
HealthCare LA, IPA- MedPOINT Management
Heritage Victor Valley Medical Group - Heritage Provider Network
High Desert Medical Group - Heritage Provider Network
Hill Physicians Medical Group
Hoag Medical Group - St. Joseph Heritage Healthcare
Integrated Health Partners of Southern California- MedPOINT Management
Jade Health Care Medical Group, Inc.
Jewish Home for the Aging IPA
John Muir Physician Network
Key Medical Group, Inc.
Korean American Medical Group - Providence Medical Services
Lakeside Community Healthcare - Heritage Provider Network
Lakeside Medical Group, Inc. - Heritage Provider Network
Lakewood IPA
Loma Linda University Health Care
Marin Headlands Medical Group - Sutter Health Foundation & Affiliated Groups
Martin Luther King, Jr. Community Medical Group
MediChoice IPA- Advanced Medical Management
MemorialCare Medical Group
Mercy Health Network- Catholic Health Initiatives
Mercy Physicians Medical Group - NAMM
Meritage Medical Network
Mid Cities IPA

Mills-Peninsula Medical Group - Sutter Health Foundation & Affiliated Groups
Mission HealthCare Network- Catholic Health Initiatives
Mission Heritage Medical Group - St. Joseph Heritage Healthcare
Monarch HealthCare
Monterey Bay Independent Physician Association
Noble AMA IPA - Physicians DataTrust
Nuestra Familia Medical Group, Inc. - Prospect Medical Group
Omnicare Medical Group
One Medical Group
Palo Alto Foundation Medical Group - Sutter Health Foundation & Affiliated Groups
Palo Alto Medical Foundation - Sutter Health Foundation & Affiliated Groups
Peninsula Medical Clinic - Sutter Health Foundation & Affiliated Groups
Permanente Medical Group, Inc.
Physician Foundation Medical Associates - Sutter Health Foundation & Affiliated Groups
PIH Health Physicians
Pioneer Medical Group
Pomona Valley Medical Group, Inc. - Prospect Medical Group
Preferred IPA of California
Premier Care of Northern California
Premier Physicians Network- MedPOINT Management
Primary Care Associated Medical Group, Inc. - NAMM
PrimeCare of Citrus Valley, Inc. - NAMM
PrimeCare of Corona, Inc. - NAMM
PrimeCare of Hemet Valley, Inc. - NAMM
PrimeCare of Inland Valley, Inc. - NAMM
PrimeCare of Moreno Valley, Inc. - NAMM
PrimeCare of Redlands, Inc. - NAMM
PrimeCare of Riverside, Inc. - NAMM
PrimeCare of San Bernardino, Inc. - NAMM
PrimeCare of Sun City, Inc. - NAMM
PrimeCare of Temecula, Inc. - NAMM
PrimeCare Select- Catholic Health Initiatives
PrimeCare Medical Group of Chino, Inc.
Prospect Health Source Medical Group, Inc.
Prospect Medical Group, Inc.
Prospect NWOC Medical Group, Inc.
Prospect Professional Care Medical Group, Inc.
Providence Care Network - Providence Medical Services
Providence Health & Services
Prudent Medical Group- MedPOINT Management
Redlands Family Practice Medical Group, Inc. - NAMM
Redwood Community Health Network- MedPOINT Management
Regal Medical Group - Heritage Provider Network
River City Medical Group, Inc.

Riverside Medical Clinic
Riverside Physician Network
Saint Agnes Medical Group
San Bernardino Medical Group
Sansum Clinic
Santa Clara County IPA (SCCIPA)
Sante Health System, Inc.
Scripps Coastal Medical Center
Scripps Physicians Medical Group
SeaView IPA
Seoul Medical Group- Advanced Medical Management, Inc.
Sharp Community Medical Group
Sharp Rees-Stealy Medical Group
Sierra Medical Group - Heritage Provider Network
Southern California Permanente Medical Group Inc. - Peoples Health Network
St Mary IPA
St. Joseph Heritage Healthcare
St. Luke's Health Network- Catholic Health Initiatives
St. Mary High Desert Medical Group - St. Joseph Heritage Healthcare
St. Vincent IPA - Physicians DataTrust
StarCare Medical Group, Inc. - Prospect Medical Group
Sutter East Bay Medical Foundation
Sutter Gould Medical Foundation
Sutter Health Foundation
Sutter Independent Physicians
Sutter Medical Foundation
Sutter Medical Group
Sutter Medical Group Of The Redwoods
Sutter North Medical Group
Sutter Pacific Medical Foundation
Torrance Health IPA
UC Davis Health
UC Irvine Health
UCLA Medical Group
Upland Medical Group, a Professional Medical Corporation - Prospect Medical Group
USC Care Medical Group, Inc.
Valley Care IPA
Watts Healthcare Corporation- MedPOINT Management