



PH ECM Focused Audit

- In their 2024 Medical Audit of CCHP, DHCS found three findings pertaining to CCHP's ECM program.
- CCHP recognizes its important role in the provision of the ECM benefit to its Medi-Cal members and is intent on ensuring that appropriate monitoring and oversight mechanisms are in place to ensure that its ECM providers are meeting regulatory requirements
 - Given the significance of these findings, CCHP pro-actively performed a Focused Audit of the Contra Costa Public Health Department to ensure that the Contra Costa Public Health Department had made mandatory improvements in its provision of ECM services to ensure compliance with regulatory requirements of ECM programs.

- Audit Period: December 1, 2024 – January 31, 2025
- Audit Performed: February 7, 2025 - February 14, 2025
- Audit Procedures:
 - Public Health, the JCC, and the DHCS were notified that CCHP would perform an audit
 - The ECM Policy Guide and the 2024 contract were used as guidelines
 - Audit Team: Contra Costa Health Plan staff which included a Medical Director, two Assistant Medical Directors, one Nurse Practitioners, one Registered Nurse, and Compliance staff.
 - Case sample: Random sample of 65 cases for which CCHP provided ECM authorization to PH.
 - Chart review included a special focus on the three ECM related findings.
- Audit Goal:
 - To ensure that our members' lives are improving and that we are consistently meeting the objectives of CalAIM and the ECM benefit.
 - To confirm that effective monitoring and oversight mechanisms are in place, ensuring ECM providers comply with regulatory requirements.
 - To assess that PH ECM continues to implement improvements aligned with ECM provider expectations and the previously issued Corrective Action Plan.



| Audit Element | 7/1/24 Comprehensive Audit element compliance findings (%) | 2/14/25 Focused Audit element compliance findings (%) |
|---|--|---|
| Connection/Introduction to Primary Care Provider (PCP) and other clinical providers | 37% | 84% |
| Medication Reconciliation | 37% | 95% |
| Long Term Supports Services (LTSS) assessment/Durable Medical Equipment (DME) Assessments | 35% | 95% |
| Review of Systems (clinical assessment) | N/A | 92% |
| Vital Signs (clinical assessment) | N/A | 70% |

CONCLUSION

- CCHP determined that, compared to the previous audit period (January 1, 2022 – May 20, 2024), which led to the initial Corrective Action Plan (CAP), there have been significant and commendable improvements in the implementation of key elements of the ECM program and services reviewed in this focused audit.
 - Improved assessment of non-clinical needs and clinical needs
 - Improved care coordination
 - Improved connection to PCP and other clinical team members
 - Improved provision of care plans