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To: Joint Conference Committee (JCC) Members

From: Chanda Gonzales, Compliance Officer, Contra Costa Health Plan

Date: October 3, 2025

Subject: Compliance Activities Report

Purpose

To provide the JCC with an overview of updates and notable information related to compliance activities and requirements.

Department Description

The Compliance Department coordinates all regulatory communication for the health plan, reviews and disseminates regulatory changes and requirements, monitors and ensures that all departments conduct operations in a timely, ethical, and compliant manner.

Key Accomplishments and Highlights

Compliance managed the process for this year's Department of Health Care Services on-site audit. Compliance oversaw and coordinated the audit requests for information and ensured that all responsible departments submitted the required information and documents in a timely manner. Compliance conducted quality assurance for the several hundred documents and responses submitted to the auditors. Compliance continues to oversee this process as the auditors review final submissions.

Compliance also coordinated the final submission of CCHP's 2024 Medical Audit Corrective Action Plan (CAP). We await final review from DHCS.

Compliance additionally facilitated communications with multiple regulators (DMHC, DHCS, CMS) to ensure their urgent requests for revisions to DSNP member materials were addressed promptly and by the responsible department leaders. Compliance and CCHP leader collaboration resulted in the timely submission and approval of all key DSNP member materials: member handbook, member ID card, provider/pharmacy directory, formulary. CCHP also received conditional approval from CMS for our State Medicaid Agency Contract (SMAC).



Current Priorities and In-Progress Work

- Continuing coordination of audit submissions and communication
- Continuing crucial submissions to CMS and monitoring communication for D-SNP
- Implementation of CMS compliance program requirements

Challenges

CCHP will be expanding its regulators from two state (DHCS, DMHC) to three including a federal regulator (CMS). The increasing regulatory requirements and areas for risk management require staff who have specific skills and experience. While the Compliance department has obtained additional SMEs to help train and guide staff, we anticipate greater workloads and growing responsibilities.

Looking Ahead

In October, the open enrollment period begins for our new Medicare line of business; Compliance will continue to coordinate and closely monitor federal regulatory requirements and guidelines related to this event and all preparation for becoming a Dual Special Needs Plan (D-SNP). In December, the Department of Managed Health Care (DMHC) will conduct its routine financial audit of the health plan. Compliance will coordinate with the Finance department and help support the audit process.