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7.0 Compliance Program Report

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7.1 Fraud, Waste, and Abuse

Q1 & Q2 2025 – Potential FWA Incidents

- YTD (as of 5/28/25):
 - 3 cases have been closed
 - 3 cases currently open (all received in May; ongoing investigation)
 - Potential fraudulent billing by provider
 - Potential fraudulent referral
 - Potential fraudulent billing by DME provider
- FWA team working more closely with the Cotiviti team and their SIU (special investigations unit)
- Weekly meetings implemented for SIU discussions

Public Comments

JCC Comments

7.2 HIPAA/Privacy

Q1 2025	Incidents	Q2 2025	Incidents
January	8	April	2
February	6	May	3
March	2	June	--
Q1 Total	16	Q2 Total	5

(As of 5/28/25)

- 71% of the incidents to date occurred externally
 - 15 of the 21 incidents involved a provider or clinic
- 4 active investigations
- 2 CAPs being implemented
 - 1 with CCHP and 1 with an outside clinic

Public Comments

JCC Comments

7.3 Audit Calendar



- **DHCS Medical Audit** confirmed schedule of **Aug. 18 – Aug. 29**, on site.
- **DMHC Finance Audit** scheduled for **December 8, 2025**
 - formal letter to be sent in August
- **DMHC Routine Survey Audit** projected for **April 2026**
 - formal letter to be sent 6 months prior

Public Comments

JCC Comments



7.4 DMHC APL Healthcare Legislation

DMHC All Plan Letter (APL) 24-023

- ❖ Released 12/20/24
 - ❖ 23 Assembly and Senate bills under this APL, 19 with current requirement to file.
 - ❖ Required changes include system-wide updates such as processes for authorizations, claims, member notices.
- CCHP filed initial submission 3/21
 - CCHP filed second submission on 5/21
 - Implementation continuing; some requirements scheduled to start in July 2025

- 📁 AB 1936 - Maternal Mental Health Screenings
- 📁 AB 2105 - Coverage for PANDAS and PANS
- 📁 AB 2129 - Immediate Postpartum Contraception
- 📁 AB 2556 - Behavioral Health and Wellness Screenings - Notice
- 📁 AB 2843 - Health Care Coverage - Rape and Sexual Assault
- 📁 AB 3059 - Human Milk
- 📁 AB 3221 - DMHC - Review of Records
- 📁 SB 1180 - Health Care Coverage - Emergency Medical Services
- 📁 SB 1320 - Mental Health and Substance Use Disorder Treatment
- 📁 SB 339 - HIV Preexposure Prophylaxis and Postexposure Prophylaxis
- 📁 SB 729 - Health Care Coverage - Treatment for Infertility and Fertility Services

Public Comments

JCC Comments