

Policy Title: PCP Assignment for Medi-Cal and Medicare Full and Partial			POLICY #: 10.2.29		
Duals		Line of business: Medi-Cal			
Department Name: Utilization Management	Original Date 12/14	Effective Date 5/19 Revision Date 12/18, 9/22			
Department Head: Sr. Director, UM			Date: 10/21		
Medical Services/P&T Committee: (If Applicable) PHP CMO			Date: 10/21		

PURPOSE

To meet the Primary Care Provider (PCP) assignment requirements in accordance with ALL PLAN LETTER 14-015 for beneficiaries eligible for both Medi-Cal and Medicare (Duals)

To delineate the criteria and circumstances in which a Full or Partial Dual member will be assigned a Medi-Cal PCP through the Medi-Cal (MCP) in order to effectively coordinate the beneficiary's health care needs.

DEFINITIONS:

Primary Care Physician (PCP)

The PCP is defined as a physician, who is responsible for supervising, coordinating, and providing, initial and primary care to patients, initiating referrals, and maintaining continuity of patient care. A specialist is considered a PCP if the specialist is serving as beneficiary's primary care provider.

Medicare PCP

The Medicare PCP coordinates all of the member's care and authorizations for all services. If the member has a Medicare PCP, the Medi-Cal PCP will not be required to coordinate any services.

Med-Cal PCP

A Medi-Cal PCP shall meet the health, cultural, language, and accessibility needs of the Dual. The Medi-Cal PCP serves in a coordination-only role for the members care and will arrange Medi-Cal benefits and services for the member.

Full Dual

These individuals are entitled to Medicare Part A and B and are eligible for Medi-Cal benefits

Partial Dual

These individuals have Medicare Part B only and are eligible for Medi-Cal benefits.

POLICY

According to Welfare & Institutions Code (W&I Code) Section (§) 14182.17 (d)(3), MCPs are prohibited from assigning Duals, who opt-out of Cal MediConnect, to a Medi-Cal PCP, except in limited circumstances and for limited reasons. When circumstances are identified, Blue Shield of California Promise Health (Blue Shield Promise) will follow the requirements of APL 14-015 in assigning a Medi-Cal PCP for the following populations and under the following circumstances:

Dual eligible beneficiaries who opt-out of Cal MediConnect and choose only a Medi-Cal plan **should not**, in most circumstances, receive a primary care physician (PCP) assignment from their Medi-Cal Plan. Instead, the Medicare provider will continue to act as the beneficiary's PCP under either Medicare fee-for-service or a Medicare Advantage (MA) plan.

A. Full duals

- a. The MCP **may** assign a Medi-Cal PCP if the Dual member:
 - i. Requests a Medi-Cal PCP
 - ii. Is determined through the risk stratification and health risk assessment process to necessitate assignment of a PCP in order to properly coordinate the care of the Full Dual
 - iii. The Dual may change their MCP- assigned PCP at any time and/or choose a Medicare PCP and forego the MCP assigned PCP.

B. Partial Duals

- a. Partial dual eligible members with Part B only and choose only a Medi-Cal plan should not, in most circumstances, receive a primary care physician (PCP) assignment from their Medi-Cal Plan. Instead, the Medicare provider will continue to act as the beneficiary's PCP under Medicare fee-for-service.
- b. The MCP shall assign a Medi-Cal PCP if the Partial Dual member:
 - i. Receives primary or specialty care through the MCP
 - ii. The Partial Dual may change their MCP assigned PCP at any time and/or may choose a Medicare PCP and forego the MCP assigned PCP selected for them.
- c. The MCP may assign a Medi-Cal PCP if the Partial Dual member:
 - i. Requests a Medi-Cal PCP
 - ii. Is determined through the risk stratification and health risk assessment process, which includes the evaluation of 12 months of historical claims data, to not have a Medicare PCP.
 - iii. Is determined through the risk stratification and health risk assessment process to necessitate assignment of a PCP in order to properly coordinate the care of the Partial Dual.
 - iv. The Partial Dual may change their MCP assigned PCP at any time and/or may choose a Medicare PCP and forego the MCP assigned PCP selected for them.

PROCEDURE

When it has been determined by Blue Shield Promise Health Plan through the risk stratification and/or health risk assessment process (conducted in compliance with current requirements as they pertain to Full and Partial Duals), that a PCP assignment is necessary to properly coordinate the care of member, a PCP shall be assigned as follows:

- 1. Blue Shield Promise Health Plan will perform a needs assessment on Dual members to determine if a Medi-Cal PCP assignment is in order.
- 2. This will be accomplished through the risk stratification and health risk assessment process.
- 3. The risk stratification and health risk assessment process shall include the evaluation of 12 months of historical Medicare claims data to identify any member that does not have a Medicare PCP.
- 4. The data will be provided to the Plan by DHCS.



- 5. Upon receipt of the data Blue Shield Promise will analyze the data and determine if there is an existing Medicare PCP by specifically evaluating the data ascertain if the member has received primary or specialty care through Medicare Parts A or B in the last 12 months.
- 6. Any Full or Partial Dual who is found to not have claims experience with a Medicare primary or specialty care physician in the last 12 months will be considered to not have a Medicare PCP.
- 7. Blue Shield Promise will assign these members a Medi-Cal PCP.
- 8. The Full or Partial Dual may change their MCP-assigned PCP at any time and/or may choose a Medicare PCP, if the Dual has Medicare Part B, and forego the MCP assigned PCP selected for them.
- 9. In instances when a Full or Partial Dual has an existing Medicare PCP and requests or is assigned a Medi-Cal PCP, the Medi-Cal PCP will not be required to provide authorization for any service.
- 10. Blue Shield Promise shall inform the beneficiary of the Medi-Cal PCP's coordination only role.
- 11. The Medi-Cal PCP shall be geographically accessible to the Dual and meet the health, cultural, language and accessibility needs of the Dual.

REFERENCES

Welfare & Institutions Code (W&I Code) Section (§) 14182.17(d)(3), and 14182.17(d)(2)(I)(4) APL 14-015 dated November 24, 2014

