

Table B
Audit Objectives and the Methods Used to Address Them

AUDIT OBJECTIVE	METHOD
<p>1 Review and evaluate the laws, rules, and regulations significant to the audit objectives.</p>	<p>Reviewed relevant state laws, rules, and regulations applicable to the perinatal program.</p>
<p>2 Analyze Medi-Cal data to determine the following:</p> <p>a. Perinatal program utilization rates for Medi-Cal members enrolled in a managed care plan versus a fee-for-service plan.</p> <p>b. Program utilization rates for Medi-Cal members during pregnancy and during both the 60-day postpartum period and the recently extended 12-month postpartum period.</p>	<ul style="list-style-type: none"> • Obtained Health Care Services' claims and eligibility data. • Calculated the number of fee-for-service Medi-Cal members who used perinatal program services and determined the annual utilization rates for fee-for-service Medi-Cal members. • As we describe in the report, data limitations prevented us from determining the overall utilization rates for the perinatal program. • Obtained Health Care Services' claims and eligibility data. • As we describe in the report, data limitations prevented us from determining the overall utilization rate for the perinatal program.
<p>3 Evaluate the guidance that each department provides to plans and providers to determine the following:</p> <p>a. The extent to which the State communicates the availability of the perinatal program to plans, providers, and beneficiaries, including fee-for-service beneficiaries.</p> <p>b. Whether the State's contracts and policies clearly specify the roles and responsibilities of the managed care plans relating to timely access to program benefits.</p> <p>c. The extent to which the State requires managed care plans to educate providers on the program's benefit.</p> <p>d. Whether the Medi-Cal Member Handbook includes and adequately describes the perinatal program's benefits.</p> <p>e. The extent to which the State ensures that the component services of the program, including health education, nutrition counseling, and psychosocial services, are provided to pregnant and postpartum Medi-Cal members. Determine whether the State's approach varies under managed care plans versus fee-for-service.</p>	<ul style="list-style-type: none"> • Interviewed staff at Health Care Services and Public Health to assess the extent of their communications with managed care plans, providers, and Medi-Cal members. • Evaluated handbooks for the five managed care plans operating in the four local health care jurisdictions we selected in Objective 6, as well as the template provided by Health Care Services, to assess the communication provided against legal requirements. • Reviewed the five managed care plan contracts from the plans in the four jurisdictions we selected in Objective 6 to assess whether the contracts from 2018 through 2022 clearly communicated required elements such as the timely availability of perinatal program services. • Reviewed Health Care Services' and Public Health's policies for the perinatal program to evaluate whether they specified roles and responsibilities related to timely access to benefits. • Reviewed managed care plan contracts and Health Care Services' policies and processes to evaluate the extent to which plans are required to educate providers on the perinatal program benefits. • Reviewed Public Health's policies and processes to determine the extent to which fee-for-service providers are required to educate provider staff on perinatal program benefits. • Reviewed the member handbooks from the five plans operating in the jurisdictions we selected for Objective 6, the Health Care Services booklet designed for all Medi-Cal members, and the handbook templates available in both 2018 and 2023 to determine if they include adequate descriptions of perinatal program services. • Interviewed relevant staff at Health Care Services and Public Health to obtain perspective related to their oversight processes. • Conducted a comparison of the oversight process for managed care versus fee-for-service. • Reviewed provider reviews conducted by local health jurisdictions and triennial reviews conducted by managed care plans and Health Care Services to determine the extent of oversight provided.

AUDIT OBJECTIVE	METHOD
<p>4 Identify any internal or external reviews relevant to the perinatal program—such as the triennial plan review—and determine the following:</p> <p>a. The degree to which these reviews examine the perinatal program, including trimester and postpartum assessments, individualized care plans, and follow-up services.</p> <p>b. How long the reviews have evaluated the perinatal program, and the extent to which these reviews have resulted in meaningful findings and actionable recommendations for program improvement.</p>	<ul style="list-style-type: none"> • Reviewed the triennial reports from 2018 through 2022 to determine the extent to which the triennial reports examined the perinatal program. • Conducted interviews with Health Care Services staff for perspective related to oversight of managed care plans. • Assessed Health Care Services’ internal review of managed care plans for sufficiency in relation to the perinatal program. <p>Reviewed Health Care Services and Public Health’s policies, audits, and internal oversight systems to determine how long the reviews have examined the perinatal program and whether actionable recommendations were created from these reviews.</p>
<p>5 Determine what steps Health Care Services and Public Health can take—including any enforcement mechanisms it may possess—to hold managed care plans or fee-for-service providers accountable when deficiencies related to program benefits are identified. To the extent possible, determine the extent to which either agency has used these enforcement mechanisms and to what effect.</p>	<ul style="list-style-type: none"> • Reviewed applicable law and regulations to determine available enforcement mechanisms. To the extent they existed, evaluated Health Care Services’ and Public Health’s policies and procedures related to enforcement. • Reviewed corrective action plans and Health Care Services’ follow-up to determine whether policies and procedures were followed and whether any identified deficiencies related to the perinatal program. • Reviewed performance improvement projects related to managed care plans in the jurisdictions we selected in Objective 6 to determine their focus and whether they related to the perinatal program.
<p>6 For a selection of local perinatal services coordinators, determine whether they review the medical information of Medi-Cal members who are receiving—or who should be receiving—program benefits. Determine whether either department obtains the results of the chart reviews and evaluate how the departments use this information.</p>	<ul style="list-style-type: none"> • Judgmentally selected four local health jurisdictions—the counties of Imperial, Fresno, Plumas, and Sonoma. We used data on low birthweights, infant mortality, population, and number of births to select jurisdictions representing urban and rural areas. • Evaluated the 11 chart reviews conducted in our selected jurisdictions to determine the extent to which they ensure that providers appropriately assess Medi-Cal members’ need for services, develop individualized care plans, refer Medi-Cal members to services, and follow up on receipt of services. • Conducted a survey of all 61 local health jurisdictions to determine whether they conduct chart reviews and to gather perspective on the perinatal program. • Reviewed applicable law and Public Health’s policies concerning local coordinators to assess the extent of any oversight it provided related to chart reviews.
<p>7 Determine whether there are any regulatory or policy restrictions prohibiting program services from being provided in homes or in a community setting. To the extent possible, evaluate the effect of these restrictions.</p>	<ul style="list-style-type: none"> • Interviewed relevant staff at Health Care Services, Public Health, and our selected local health jurisdictions to identify any potential restrictions on providing perinatal services in homes or community settings. • Reviewed relevant law and Medi-Cal policies to determine the extent of any restrictions on services being provided in homes or community settings.
<p>8 Review and assess any other issues significant to the audit.</p>	<p>None identified.</p>

Source: Audit workpapers.