

Population Health Management Strategy & Program Description

MCND9001 (previously MCCD2027)

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Table of Contents

Program Purpose	4
Introduction	4
Data Analysis and Strategy	4
Population Needs Assessment	6
Social Drivers of Health and Community Needs	7
Population Risk Stratification & Segmentation	8
Programs and Services	12
Organizational Support for PHM	13
Health Education	18
Material Development	20
Member Incentives	21
Point of Service Education	22
Practitioner Education and Training	23
Health Education Interventions	23
Other Activities – Interventions that Indirectly Affect Members	24
Informing Members About Available PHM Programs	25
Community Engagement and Coordination of PHM Programs	26
Informing Members on Interactive Content	27
Program Evaluation	28
Identifying Opportunities for Improvement	29
Delivery-System Supports for Population Health Management	29
Value-Based Payment Programs	29
Incentivizing Patient-Centered Medical Home (PCMH) Recognition	29
Sharing Data	30
eReports	30
Partnership Quality Dashboard (PQD)	31
Transformation Technical Assistance	31
Population Health and Health Education Delegation Oversight and Monitoring	32
Population Health Department Structure	32

Team Roles and Responsibilities	33
References	36
Population Health Management Strategy & Program Description Approval	37
Appendix A	38
Appendix B	39

Program Purpose

To identify the strategy and organizational structure Partnership HealthPlan of California (Partnership) utilizes to assess, segment, and act in order to meet the needs of its member population and subpopulations within the context of the various communities in which Partnership's members live.

Introduction

Partnership's Population Health Management (PHM) Strategy & Program Description outlines a cohesive plan of action for addressing Partnership's member needs across the continuum of care engaging not only the Population Health department, but also multiple departments within the organization. The unique characteristics and needs of Partnership's member population determine the programs and services designed to help individual members and subpopulation groups, in alignment with California's Department of Health Care Services (DHCS) and the National Committee for Quality Assurance (NCQA) requirements. This document also highlights Partnership-sponsored delivery system supports designed to enhance population health management within our provider network, describes the process for annual assessment of member needs, and the effectiveness of our population health strategy in meeting those needs. As part of Partnership's Population Health strategy, Partnership is committed to identifying root causes of health disparities for its members and collaborating across the organization, with providers, and with other community agencies to eradicate inequities for the members we serve. Partnership's annual Population Needs Assessment (PNA) identifies factors leading to health disparities for Partnership subpopulations, and outlines a plan for addressing and mitigating these disparities.

Data Analysis and Strategy

Partnership uses several methods to identify member needs, and to strategize the means best to meet them. The annual PNA describes the overall health, social, health education, and cultural and linguistic needs of Partnership's membership by analyzing service utilization patterns, disease burden, and gaps in care for our members, taking into account their risk level, geographic location, and age groups and recommends interventions to address barriers and disparities. The PNA identifies community resources to integrate in program offerings (including Partnership's Community Resource pages), and describes Partnership's collaboration with community leaders in support of the population. The PNA informs Partnership's overall PHM strategy and is electronically submitted to the appropriate governing bodies in June of every year. Key stakeholders within Partnership review PNA findings and, from there, develop the annual Population Health Management (PHM) Work Plan, the annual Cultural &

Linguistics (C&L) Work Plan, and appropriate health education interventions. These work plans outline specific interventions to mitigate health disparities both on a member and system level. The PHM Strategy & Program Description provides a high-level overview of Partnership's approach to improving the health and wellbeing of the population we serve. The PHM Work Plan provides details on specific member-facing interventions, staff who will perform the interventions, method of contact, and outcome measures Partnership will implement during the year. Similarly, the C&L Work Plan identifies specific health equity concerns and provides a strategy for how Partnership will address them through annual activities. The PHM Impact Analysis report evaluates Partnership's programs and services to determine if the benefits offered are adequate to meet our member needs and identifies opportunities for further intervention. The following diagram shows the relationship of these activities:

Population Needs Assessment (PNA)

- Assesses overall population needs
- Identifies barriers to care and areas of health disparities
- Proposes actions and interventions to mitigate these concerns
- Evaluates sufficiency of resources to meet population needs

Population Health Management Strategy & Program Description

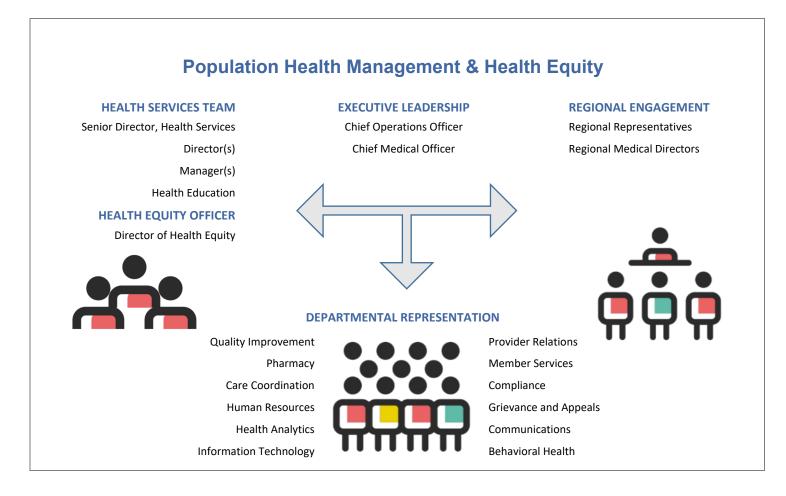
- Outlines overall approach to Population Health for Partnership members
- Describes direct member interventions, indirect interventions, and delivery system supports
- Appendices:
- Population Segmentation Report
- Annual PHM Work Plan

Population Health Program Impact Analysis

- Analyzes PHM Work Plan activities and the impact of these interventions
- Identifies opportunities for coming year interventions

In 2022, Partnership created the Population Health Management & Health Equity (PHM&HE) Committee, which meets quarterly to align interdepartmental efforts towards health equity through member-facing and systemic interventions outlined in the PNA

Action Plan (see figure that follows). In conjunction with the Quality Improvement and Health Equity Committee (QIHEC), the PHM&HE Committee ensures Partnership is meeting DHCS and NCQA requirements and individual member needs for health equity, culturally and linguistically appropriate services (including appropriate language access services at all points of contact), health education, and Basic Population Health Management (BPHM) interventions. It also reviews new state and community initiatives to ensure Partnership programs meet these objectives without duplicating interventions from other sectors. This forum provides the platform to review and implement organizational initiatives, and to revise existing programs and services, if needed, to ensure continuous process improvement and program evolution in accordance with the needs of the population. Multidisciplinary workgroups convene several times per year to analyze the results of Partnership's interventions, and to develop and refine program offerings.



Population Needs Assessment

Partnership routinely collects data regarding cultural, ethnic, racial, linguistic, health education and environmental needs of its members, and conducts a quantitative

evaluation to determine unmet needs and areas of health disparities. Data sources may include, but are not limited to, US census and enrollment data, member surveys, member grievances, and other published health statistics, as well as data provided by Health Plan sponsors or other sources. Partnership's Health Analytics and Health Education teams analyze the data collected no less than annually with the goal of ensuring Partnership and its providers deliver services that equitably meet the needs of our culturally and linguistically diverse member population.

The Health Education unit prepares an annual Population Needs Assessment (PNA) that describes our membership and region, including Partnership's demographics, community-identified needs and resources, health education, and cultural and linguistic needs, health inequities, and social and structural barriers to care. The PNA proposes actions to address identified disparities and promote health equity. The PNA also analyzes language preferences (including limited English proficiency [LEP]), reported ethnicity, use of interpreters, traditional health beliefs, and beliefs about health and health care utilization. The Senior Health Educator provides a summary report of PNA findings for discussion with the Consumer Advisory Committee (CAC) session and the Family Advisory Committees (FAC). Members of both committees are given an opportunity to provide input and advice on selecting Partnership's targeted, priority health education, and cultural and linguistic strategies and outreach programs. The PNA and its proposed actions undergo review by the PHM&HE Committee, Partnership's Internal Quality Improvement Committee, Partnership's Quality Utilization Advisory Committee, Partnership's Physician Advisory Committee, and by Partnership's Board of Directors before submission to NCQA and DHCS per regulatory requirements.

Social Drivers of Health and Community Needs

Partnership's Health Analytics department estimates the impact of Social Drivers of Health (SDOH) for the region and membership through proxy data sources. One such source is the California Healthy Places Index (HPI) data produced by the Public Health Alliance of Southern California (healthyplacesindex.org). This freely available data set ranks California census tracts on a composite score of health disadvantage by incorporating data on 25 individual indicators organized in eight domains: economy, education, healthcare access, housing, neighborhoods, clean environment, transportation, and social environment. In every census tract, each indicator is shown on standardized scales (Z-scores) of increasing disadvantage, and averaged for each domain. The overall score is calculated as the weighted sum of domain scores. The HPI data set also includes the percentiles of each domain and individual indicator, as well as the overall composite values ranking each census tract.

Using the residential addresses of members found in the Membership data files received from DHCS, Partnership's Health Analytics team determines the geographic coordinate of the census tract that corresponds to each member's valid address. The calculated census tract is then used to join Partnership's data with the HPI data set (https://healthyplacesindex.org/about/). These rankings are used in combination with the rest of the SDOH data to estimate the SDOH risks for each of Partnership's members.

Member-specific sources for SDOH data include location, distance from providers, and transportation claims that demonstrate member needs for services; demographic attributes found in membership data; specific social risk factors identified from diagnosis codes; and homelessness data derived from members' addresses and diagnosis coding. Members who are new to Partnership and having either a Senior or Person with Disability (SPD) aid code, or identified as California Children's Services (CCS) beneficiaries complete a detailed assessment of their social supports, barriers to care, food security, and financial resources, as well as their medical history and current care needs.

Members who have serious and persistent mental illness (SPMI) receive care for those conditions through county-administered Mental Health Managed Care, which is carved out of Partnership's benefit package and assigned to the county in which the member lives (see All Plan Letter 17-018: Medi-Cal Managed Care Health Plan Responsibilities for Outpatient Mental Health Services). In July 2020, Partnership began administering the Drug Medi-Cal Organized Delivery System (DMC ODS) substance use treatment services on behalf of participating counties. Partnership works together with our providers and partners in seven Partnership counties (Humboldt, Lassen, Mendocino, Modoc, Shasta, Siskiyou, and Solano) to provide integrated physical health and SUD services for the Medi-Cal population. In addition, Partnership's disease registry flags members with several SPMI conditions, such as schizophrenia or major depression. Partnership uses prescription data for anti-psychotic and specific anti-manic medications as a means of identifying members who may have any SPMI, and leverages this data to ensure members with SPMI receive care for comorbid medical conditions.

Population Risk Stratification & Segmentation

Partnership analyzes and segments the entire population by need and appropriate intervention(s), as described in the Population Segmentation Report. Partnership has developed a proprietary method for assigning members to a risk level. A member's risk for becoming a high-utilizer is calculated using a Generalized Linear Mixed Model (GLMM) by applying longitudinal data of Partnership's membership (including

race/ethnicity, age, gender, language, disability aid codes), claims (behavioral, medical, and pharmacy), case management enrollment, and external data (California's health index and census tract). The risk score model adjusts for social determinants, demographics, and disease or disability burden. Within social determinants, we adjust for homelessness, non-emergency transportation usage, and Healthy Places Index. In the demographic category, PHC adjusts the risk score by gender, age, race/ethnicity, and language. Finally, PHC adjusts for disease burden using our chronic disease registry, which identifies members having up to 19 chronic conditions as defined through HEDIS and/or CMS protocols, as well as the member's eligibility criteria under the CCS program or SPD aid codes.

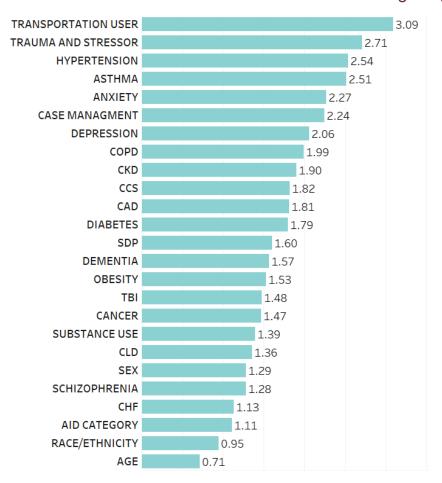
PHC's Health Analytics team has evaluated the relative significance of these factors on the member's overall risk score such that members with similar diagnoses but variations in race/ethnicity, or social determinants will have diverse risk scores assigned. The odds ratio estimates derived from the family of exponential form, with a log likelihood function and logit link function where the response variable assumed to possess Bernoulli distribution. Accordingly, for significant covariates, the standard error and p-value are as follows:

Factor	Standard Error	P-Value
Age	0.04616	<.0001
Sex	0.03699	<.0001
Aid Category	0.01733	<.0001
Race/Ethnicity	0.008272	<.0001
SPD	0.06776	<.0001
Case Management	0.04223	<.0001
CCS	0.1249	<.0001
Transportation User	0.09318	<.0001
Asthma	0.05462	<.0001
Obesity	0.03945	<.0001
Diabetes	0.04118	<.0001
Hypertension	0.04418	<.0001
Chronic Kidney Disease	0.04147	<.0001
Chronic Obstructive Pulmonary	0.04917	<.0001
Disease		
Congestive Heart Failure	0.04966	0.0109
Coronary Artery Disease	0.08542	<.0001
Chronic Lung Disease	0.05601	<.0001
Traumatic Brain Injury	0.1505	0.0093
Substance Use		<.0001
Dementia		<.0001
Cancer		<.0001
Depression		<.0001

Factor	Standard Error	P-Value
Schizophrenia	0.05167	<.0001
Trauma And Stressor	0.05265	<.0001
Anxiety	0.04154	<.0001

The higher the number, the higher the influence of the factor as a predictor of utilization. Where a number is less than 1.0, the factor has a protective influence.

The influence of isolated factors on a member becoming a high utilizer



The risk score generated from this model is defined as the probability that a member will become a high utilizer (i.e., utilization of >=5 ED Visits, >=15 Distinct Drugs, >=1 hospital inpatient admission or >=\$50,000 medical and pharmacy claims) in the next six months. Risk scores have values ranging between zero and one, going up to 5 decimal places. The Risk Level groups are determined by stratifying the entire Partnership population using cluster analysis.

Risk Level Groupings are assigned as follows:

No Risk: Risk score is less than 0.02004

Low Risk: Risk score is between 0.02004 and 0.0742 Medium Risk: Risk score is between 0.0742 and 0.20038

High Risk: Risk score is above 0.20038

Risk scores prove valuable in assigning members to risk-tiered programs for individuals whose health and well-being require the support of intensive interventions.

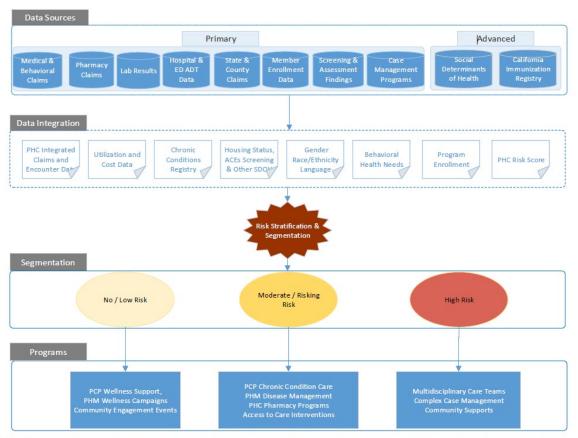
Partnership's Health Analytics team runs the risk stratification report every month so that members who have a significant change in health status are captured and offered appropriate interventions to support their health and wellbeing. In addition, Partnership's Quality team uses HEDIS data to evaluate Population Health interventions. Partnership analyzes HEDIS performance by race/ethnicity and language to identify statistically significant disparities that drive development of interventions to promote health equity within its membership.

HEDIS measures provide insight on members having gaps in care, and this information is shared with providers to help members obtain preventive and chronic care. Partnership's Population Health team uses monthly care gap reports to perform outreach to members, explaining their benefits and connecting them with providers.

The PNA describes how Partnership analyzes HEDIS Measure results in aggregate, by race/ethnicity, and by language, and examines individual measures for evidence of subpopulations experiencing disparities that warrant intervention. Census, Healthy Places Index, and County Health Rankings data provide insight into the challenges faced by communities and racial groups that lead to health disparities, such as food insecurity, housing problems, tobacco use, and other concerns. Data provided by our providers and community partners also helps identify opportunities and interventions for members with low risk scores, insufficient data to assign a risk score, or members who may benefit from intervention regardless of risk score. Partnership recognizes that cost and utilization data is insufficient to identify the needs of all racial, language, and gender groups. Therefore, Partnership mitigates the impact of racial bias that could result from risk stratification based solely on utilization patterns by evaluating the entire population through multiple lenses (including race, language, housing status, and other social factors) for enrollment into a wide variety programs that meet subpopulation needs according to shared identifiers.

Partnership works in partnership with local providers and community resources to analyze, develop, and implement interventions that support the health and well-being of the entire population (see diagram).

Partnership's Risk Stratification and Segmentation Process



NOTE: Members transitioning from one level of care to another receive Transitions of Care Interventions in addition to services related to their risk tier

Programs and Services

Partnership leverages committees and multidisciplinary workgroups to design and implement programs and services. Using the risk stratification and segmentation method described above, the Population Health department maintains a PHM Work Plan that describes the interventions offered to members along the continuum of risk. These interventions represent Partnership's basic population health management and case management service offerings to improve the health of our members and to promote health equity within the communities we serve. Beyond the interventions described in the PHM Work Plan, Partnership work collaborates with providers, specialty groups, community based organizations (CBOs), public health agencies, local education agencies, justice programs, and other agencies to support the health and well-being of the members and communities we serve.

Organizational Support for PHM

As an organization, Partnership is engaged in promoting the health and well-being of members. Various departments address particular segments of the population, per NCQA's four area of focus and DHCS's three levels of risk. For example, Member Services, Quality Improvement, the Population Health department with the Health Education Unit, all provide outreach to members with no identified risk or low risk to Keep Members Healthy, offer BPHM interventions, and promote health equity where there are barriers to health. Population Health and its Health Education Unit, Quality Improvement, Pharmacy, and Care Coordination collaborate to identify and support Members with Emerging Risk, including racial or language groups with health disparities. Care Coordination collaborates with Utilization Review and Member Services to assist members with their Outcomes Across Settings and to bolster provider communication along the continuum of care. Care Coordination's clinical and social work teams provide highly skilled support to assist members who are Managing Multiple Chronic Conditions.

Members may move along the acuity continuum as their needs change, and services are matched to the member's evolving level of need. A member may have few identified risks, but might have difficulty navigating the healthcare system and require an intensive level of intervention through Partnership's Complex Case Management (CCM), or through other member benefits such as Community Health Worker (CHW) support or Enhanced Case Management (ECM). Conversely, a member with multiple chronic conditions may have well-established support systems and not require assistance from the Care Coordination team in order to access care. The information in the following table outlines Partnership's approach to population health management. The PHM Work Plan and supporting desktop procedures provide details about each service and the associated goals for member segments.

DHCS Risk Segment	NCQA Program/Services	Organizational Support
No/LowRisk: Members with no known risk of disease or for whom we have no claims data; focus on supporting wellness.	Keeping Members Healthy	Member Needs: To understand benefits and how to access them; identify and access providers for primary care; help with prescriptions or DME; access to non-Partnership services (Denti-Cal, In Home Support Services, etc.).

DHCS Risk Segment	NCQA Program/Services	Organizational Support
Segment	Program/Services	Population Health Interventions: Member outreach campaigns to promote well-child visits or other wellness care. Collaborate with local agencies to identify community events for underserved communities (immigrant populations, homeless members, rural and frontier communities, etc.) to promote Partnership services and benefits. Health Education Interventions: Develop and distribute member newsletters and benefits information. Create educational materials on various health topics in threshold language groups and racial groups that have outcome data revealing inequities. Member Services Interventions: Explain benefits and how they may be accessed; connect members to providers. Quality Interventions: Provide HEDIS-based gap reports to providers, showing
		which members are missing well care visits, timely immunizations, and cancer prevention screenings; evaluate interventions conducted in the provider setting where members are directly engaged and receive services; share resulting best practices for improving HEDIS measure performance and the quality of care members receive.

DHCS Risk Segment	NCQA Program/Services	Organizational Support
Moderate / Rising Risk Pregnant members, or members that that have risk of disease/ disease exacerbation, or a newly diagnosed chronic illness. Racial groups with inequitable access to health care, e.g., American Indian access to mammograms.	Managing Emerging Risk	Member Needs: Access to specialty care and/or behavioral health providers to manage emerging or stable chronic conditions; resources/education supporting lifestyle management to maximize health and wellness, and mitigating effects of chronic disease; education on managing new diagnoses. Population Health Interventions: Offer BPHM services to engage members to understand barriers to care; provide member coaching on how to manage chronic illnesses. Outreach to members who are homebound or vulnerable to poor air quality to encourage them to prepare for disasters and wildfires. Schedule mobile mammography clinic days in conjunction with Tribal Health clinics. Care Coordination Interventions: Outreach to CCS members who have not had an annual well-child visit to encourage them to maintain program eligibility; coordinate care for members who identify (or whose provider identified) a care gap or equipment gap, who need basic case management support. Grievance Interventions: Streamline grievance process and produce educational videos in multiple languages to educate non-English speaking or LEP members on how to report dissatisfaction.

DHCS Risk Segment	NCQA Program/Services	Organizational Support
		Health Education Interventions: Develop and distribute educational member materials on staying healthy, common conditions, and their management, aligning with member age, sex, education, culture, and at a 6 th -grade reading level.
		Pharmacy Interventions: Educate pregnant members on the importance of prenatal and well-baby immunizations, perform outreach to members who show interest in smoking cessation, and educate diabetic members on the importance of statin therapy.
		Quality Interventions: Develop reports that identify members with chronic conditions showing gaps in HEDIS measures specific to monitoring chronic disease management. Member Services uses these reports to remind members of these care gaps during member calls. Evaluate interventions conducted in the provider setting where members are directly engaged and receive services; share resulting best practices for improving HEDIS measure performance and member-level outcomes
Transitions of Care: Members going through transitions in their care.	Outcomes Across Settings	Member Needs: Assistance with transitions between settings, such as acute care to home or skilled nursing facility to home.
		Member Services Interventions: Support members discharged after hospitalization

DHCS Risk Segment	NCQA Program/Services	Organizational Support
Segment	Program/Services	who may need to establish care with a PCP. Utilization Management Interventions: Collaborate with facility discharge planners to approve post-acute care needs. Care Coordination Interventions: Review and implement of hospital discharge plan; coordinate services; assess member's need for ongoing case management; help schedule follow-up appointments; ensure transportation is available to attend appointments; collaborate with the PCP office to ensure
		a full transition of care.

DHCS Risk Segment	NCQA Program/Services	Organizational Support
High Risk: Members with multiple chronic conditions, unmanaged conditions like asthma or diabetes, medically fragile, frequent visits to emergency department and/or inpatient admissions; may also have poor social supports or other psychosocial issues.	Managing Members with Multiple Chronic Conditions	Member Needs: Coordination of medically complex care needs. Members may have multiple chronic conditions or unmanaged chronic conditions or may be complex due to other factors such as disorganized care delivery, cognitive or developmental impairment, behavioral health challenges, or lack a wellness support structure. Care Coordination Interventions: Complex case management support; personalized assessments; individualized care plans; motivational interviewing; medication reconciliation; education/support for disease(s); coordination of services; assistance accessing social and community supports; interagency coordination to reduce duplication of efforts; may include face-to-face interactions.

Health Education

The Health Education team is integrated into the Population Health department and works closely with all Partnership departments to assess member needs, to evaluate and improve established programs/activities, and to develop and implement new programs/activities/materials to help members improve their health. The Health Education Team promotes a variety of strategies and methods to deliver evidence-based health education programs, services, and education materials directly to members (including members under age 21), and through members' health care providers according to members' health education and cultural and linguistic needs.

The Health Education team uses general health education, health promotion, and patient education to help Partnership's members prevent sickness and disease; improve their health; manage their illnesses; effectively use health care services; and ensure

that members who have not had a recent visit with their assigned medical home or PCP receive health education on the importance of primary care (including members under age 21). Partnership also provides health education opportunities to members directly through resources offered on the Partnership Member Portal and via select subcontracted providers who are skilled in delivering health education services and whose performance is monitored. Select written Health Education materials are available on Partnership's website for members, providers, and the community at large. Partnership members can also call in to request additional health education materials or resources. Finally, Partnership promotes health education information and Population Health programs through the member newsletter, the provider newsletter, the Partnership website and social media, and through targeted outreach.

Partnership's Health Education system promotes member health through 3 categories of educational interventions:

- Effective use of managed health care services: Partnership provides written information (at a 6th grade reading level) to help members effectively use the services of their managed care plan. This includes accessing preventive and primary health care services, obstetrical care, appropriate use of complementary and alternative care, dental and vision care, and health education services.
- Evidence-based Risk-Reduction as well as Wellness & Prevention programs:
 Partnership connects members to educational interventions designed to modify
 health behaviors, achieve and maintain healthy lifestyles, and promote positive
 health outcomes. Programs can include: smoking and tobacco cessation;
 managing stress; injury prevention; prevention of sexually transmitted diseases
 and; nutrition/healthy eating, weight maintenance, physical activity; avoiding risky
 drinking; and identifying depressive symptoms. These interventions are available
 on Partnership's Member Portal as Healthy Living Tools.
- Evidence-based Healthy Lifestyle, Self-Care, and Management of Health
 Conditions: Partnership provides or connects members to health educational
 interventions that can help members learn about and follow self-care
 management for existing chronic diseases or health conditions like obesity,
 pregnancy, depression, asthma, diabetes, and hypertension.

This collection of health education strategies forms the health education system. The health education system is maintained and monitored to ensure equal access to all Partnership programs for all members, including accessibility for Limited English Proficient (LEP) members; to ensure appropriate allocation of health education resources; and to conduct appropriate levels of program evaluation. All programs and

materials are available to members at no charge. Programs will not discriminate against Partnership members for any reason.

The Senior Health Educator participates in Partnership's internal committees, addresses quality and compliance with Partnership's programs. The Senior Health Educator ensures that all health education programs and materials are appropriate for members of varying demographics, including but not limited to: language, age, race, ethnicity, national origin, disability, sex and gender [per Section 1557 of the Patient Protection and Affordable Care Act (ACA 1557)].

Material Development

In collaboration with Population Health, Care Coordination, Communications, Pharmacy, Quality Improvement, and other departments, the Health Education team develops targeted health education materials to help members modify health behaviors, achieve healthy lifestyles, and promote health equity (See Appendix A). Data from the PNA and other resources also guides decisions regarding the availability of health educational materials and resources for specific member populations. Furthermore, the health education team assesses member health care needs and barriers to care by consulting regularly with the Consumer Advisory Committee (CAC), the Family Advisory Committee (FAC), community organizations, PHC's Chief Medical Officer, and also through community outreach, use of Healthy Living Tools, key informant interviews, and analysis of PHC's data. Materials are available to members through direct mail, their network provider's office, community events, on the Partnership website and Member Portal, and via email by request.

The Senior Health Educator assesses written, member facing materials for readability and suitability according to state and national guidelines, which ensures that member facing materials are written at the sixth grade reading level using a readability formula that is most appropriate and reliable for the type of materials and target audience. The Senior Health Educator also ensures that health education materials are culturally and linguistically appropriate for the intended audience with special attention to concept, density, tone, key messages, including format, page design and graphics, and that documents are up-to-date. Health education materials are made available in Partnership's threshold languages, large font, and in any of California's top 18 non-English languages upon the request of the member. Partnership Health Educators can approve written member health education materials as long as the following conditions are met:

- Materials purchased to distribute for member health education are from a DHCS approved company. The Health Education team will maintain a list of approved companies as these are updated by DHCS throughout each year.
- Materials are field-tested to ensure written health education materials are understood by the target audience. The qualified Senior Health Educator will provide oversight of the field-testing of all materials. Field-testing is designed to garner feedback from the targeted audience for the materials and may include community focus groups, key informant interviews, simple review and surveys by community member, and/or review during Consumer Advisory Committee and Family Advisory Committee meetings. The health education team will review the results and adapt materials as needed and as appropriate.
- Health Education materials are assessed using the Readability and Suitability Checklist (per DHCS website requirements). They are approved when:
 - o A majority of the Readability and Suitability Checklist provisions are met.
 - When some of the Readability and Suitability Checklist provisions are somewhat met and/or not met, so long as the qualified Health Educator provides justification, and keeps the justification on file with the Suitability Checklist.
- The signed/approved Readability and Suitability Checklist, along with the approved health education material, must be kept (electronic file or hard copy) by the health plan and made available to DHCS for auditing/monitoring purpose upon request.
- The assessment and approval process must be conducted by a qualified health educator/health education specialist with the equivalent training and background required by DHCS per <u>APL 18-016</u>.

Health education staff who do not meet the definition of a "qualified health educator" as listed above will not approve health education materials for Partnership. If Partnership does not have a qualified health educator on staff to assess and approve health education materials, Partnership will submit health education materials to the Managed Care Quality and Monitoring Division (MCQMD) of DHCS for review and prior approval, along with a completed Readability and Suitability Checklist.

Member Incentives

Non-monetary member incentives (MI) may be used in conjunction with, or as a component of, Partnership education programs and Basic Population Health Management programs to motivate members to adopt heathy behaviors and enhance health education activities, including participation in focus groups. Member incentives must meet DHCS guidelines and follow Partnership's approval process for Member,

Survey and Focus Groups (see Appendix B). MI program components include, but are not limited to:

- Increasing member participation, learning, and motivation to effectively use health care services including preventive and primary care services.
- Appropriate health care utilization that includes, but is not limited to:
 - Timely prenatal and post-partum care
 - Timely immunizations
 - Timely well child visits
 - Timely screenings (i.e., mammograms, colorectal screening)
 - Regular monitoring tests for chronic diseases
- Non-monetary member incentives that may range in value depending on the components of the health education program.
- A Member Incentive Request or Focus Group Request form (per APL 16-005) that includes:
 - o Completion of the MI request form by a qualified Health Educator
 - Review by PHC's Regulatory Affairs and Compliance Coordinator
 - Submission to DHCS Health Education Consultants for final review and approval at least two weeks prior to implementing new MI programs or focus groups.
- Annual Member Incentive Evaluation forms are required to be submitted to the DHCS Health Education Consultant thirteen (13) months after the planned program start date. If the program has ended, a Member Incentive Evaluation form must be submitted to the DHCS Health Education Consultant within 45 days from the date the program ended.

Point of Service Education

Partnership ensures that network providers will complete an Initial Health Appointment (IHA) for new members within 120 days of a member's enrollment in Partnership HealthPlan of California (PHC) or within 120 days of a member's assignment to a PCP (whichever is most recent). The IHA must include the member's physical and behavioral health history, identification of risks, an identification process of any needs for preventive screens or services, referrals to health education where appropriate, physical examination, and if applicable, the diagnosis and treatment plan for any diseases.

Primary Care Providers (PCPs) are responsible for the screening and identification of members with specific health educational needs. PCPs are also responsible for providing appropriate health education information or referring the member and/or the caregiver to Partnership's Population Health department for assessment of appropriate health education activities or materials, and for following up on referrals (including providing anticipatory guidance).

Member can also identify their own needs for health education. Partnership makes educational materials, resource information, and other tools (such as training, and programs) available to help network providers provide health education services. Select Health Education materials are available on Partnership's website or upon request.

Partnership Health Education materials and resource topics are also available on Partnership's Member Portal and include, but are not limited to:

- Age-Specific Anticipatory Guidance
- Alcohol and drug use
- Asthma
- COPD
- Chronic Disease Management
- Diabetes Management
- Family Planning (contraception)
- Heart Disease & Prevention
- HIV/STD Prevention
- Immunizations
- Injury Prevention

- Living Well with a Disability
- Medication Management
- Nutrition
- Parenting
- Perinatal/Breastfeeding
- Physical Activity
- Preventive Screening
- Senior Services
- Stress Management
- Tobacco Prevention & Cessation
- Weight Management & Exercise

Practitioner Education and Training

Partnership's Health Education team supports network providers through trainings on the unique cultural needs of Partnership's member populations. The PNA is one of the tools that serves as guidance for provider trainings highlighting Partnership members' beliefs about illness and health, their cultural health behaviors, and their preferences for interacting with providers and the health care system. The trainings are designed to support network providers and their staff in providing effective health education in a manner that respects the cultural and linguistic diversity of patients and promotes health equity.

No less than annually, PHC offers trainings to providers in its network on topics of health equity, including cultural competency, bias, diversity or inclusion. training topics include, but are not limited to: Seniors and Persons with Disabilities awareness and sensitivity, preventive health care for children, Alcohol Misuse Screening and Counseling, and other concerns as appropriate for the population. Trainings may be delivered in person, virtually, and made available on the external website.

Health Education Interventions

The PNA serves as the vehicle for setting the Health Education Program goals that are documented in the Cultural & Linguistic (C&L) Work Plan. The C&L Work Plan also

describes the methodology for evaluating intervention outcomes to ensure Partnership is effective in delivering high-quality health education interventions for our members to promote health equity and reduce disparities. The PNA evaluates and makes recommendations for appropriate allocation of health education resources based on needs assessment findings, provider training results, Partnership staff training results, intervention evaluation results, and other data. The departments responsible for each specific intervention monitor their outcomes to ensure program objectives are being met. Performance improvement plans are implemented as necessary to improve Partnership and provider performance in delivering programs and services to our members.

Other Activities – Interventions that Indirectly Affect Members

There are many opportunities to collaborate through joint action with providers, county initiatives, and local care management programs to meet the needs of individual members. The following table describes the strategies used to promote population wellness through partnerships with community resources and organizations.

Initiative Type	Definition
Partnership	An automated list of members with missing services supplied to
Provider	providers that are specific to low-performing HEDIS measures
Population	and immunization status updates. Supports providers in
Reports	conducting direct outreach to close gaps in preventive care.
Outreach/	Based on the list of care gaps provided by Partnership, provider
Scheduling Calls	offices call members to remind them about scheduling needed
	services.
Scheduling Block	Clinic days at provider sites or health centers where blocks of
	appointment time are scheduled for Partnership members to
	receive missing services.
Poster Campaign,	Educational events where students create art projects that
School	amplify a health topic (e.g., immunizations, tobacco prevention);
Engagement	engagements with screening sessions at school clinics.
Provider	Monthly Medical Director Newsletter to Primary Clinician
Newsletters	Leaders, as well as a quarterly publication by the Provider
	Relations department (Provider Newsletter) with dedicated

Initiative Type	Definition
	space for Quality Improvement and Member Engagement
	articles for providers to consider applying to their patients.
Provider Education	Coaching, consultation, measure review, and in-depth guidance for providers on HEDIS/Quality Improvement Program (QIP) measures as part of the Partnership value-based payment program, improving communication between providers, and promoting appropriate specialty referrals. Annual training on health equity.
Provider Fax Blast	Communication to all network providers for important updates
(email or fax)	(e.g., a fax blast on new standards for using combined long acting beta agonist/corticosteroid combinations in treating asthma).
Partnership	Changing banners to communicate health information to
Website	providers, community-based organizations, as well as to members.
Point of Service	Inform pharmacies of important clinical issues (such as drug
Interaction	class duplication) through point of service notices.
Media Campaign	Social media campaign(s) and county-level websites focused on
	improving member education and influencing member decision-making in preventive services/screenings. Websites include Public Service Announcements from local providers and community-based organizations.

Informing Members About Available PHM Programs

Partnership shares information on programs and services available to the communities it serves in multiple ways, including Partnership's website (www.partnershiphp.org), the Partnership Member Portal, member newsletters, program introductory letters, and telephonically through Partnership's Care Coordination, Population Health, and Member Services departments. When a member requires a referral into a Population Health or Care Coordination program, the member is directed to the appropriate staff for assistance with enrollment to the program best matching the member's level of need.

Community Engagement and Coordination of PHM Programs

Partnership has committed to being an active partner in each of the communities it serves, through local presence, local knowledge, and consciously building productive and strong working relationships. The new emphasis on Population Health is an exciting opportunity to expand community engagement activities and build on the strong partnerships developed over many years, and in some cases, decades.

Partnership is divided into four distinct geographic areas, with regional offices strategically located in each area. Regional offices and the regional staff are responsible for working closely with local providers of health care to Partnership members, county health and social services departments, local health improvement coalitions and a variety community based organizations addressing the social, economic and health needs of Plan members. Regional staff live and work in these communities and share their knowledge of the managed care program with the community, and just as importantly, share their knowledge of the community with Partnership.

Regional staff meet regularly with county health and social service leaders to share information and collaborate on projects with aligned goals, such as childhood immunization campaigns, COVID-19 vaccine outreach, and local disaster response management or planning. These staff attend a variety of community organization meetings and collaboratives, and they participate in local initiatives aimed at improving health and quality of life for Partnership members and others in the community. All communities (including Partnership) came together Partnership to respond to the devastating wildfires in Northern California, forming strong working relationships. Regional staff were able to build on these working relationships as the COVID pandemic emerged to share information, communicate consistently, and build cohesive strategies in each community.

Partnership has many different member programs/initiatives concurrently planned and executed. In order to prevent duplication of effort, any department planning or implementing programs affecting our members has read-only access to Essette, Partnership's case-management software system. Member-facing campaigns are logged in a Campaign Tracker and shared with the entire organization, ensuring staff are aware of current interventions. Monthly check-in meetings include all member-facing departments, and provide updates on new initiatives and outreach campaigns. Population Health department staff communicate with providers, multidisciplinary health agencies, community resources, community-based organizations, and workgroups to share and gather information about member-facing programs. This process facilitates identification, planning, and support of healthy initiatives in the community, and

identifies community programs and resources that can improve member health and wellness.

Partnership's regional liaisons and leaders in various departments actively participate in both internal and external workgroups to share information and reduce duplication of effort. Through collaborative meetings, these staff members identify community resources that may be of benefit to Partnership's members and share these resources with the organization to promote integration into program offerings and meet member needs. Programs within the community or offered through providers may include:

- Enhanced Case Management (ECM)
- Community Supports
- Regional Center participation
- Behavioral Health and Wellness & Recovery services
- Eating Disorder treatment
- Outpatient palliative care
- Other community programs such as WIC, support groups, community collaboratives, etc.

Partnership members enrolled in the above programs are tracked through Partnership's internal data platforms, along with the cloud-based Collective Medical Platform to facilitate real-time data sharing between Partnership and ECM or other community providers of services (see Partnership Policy MCCP2032). This allows members of Care Coordination or other member-facing teams to collaborate with community partners and external case management leads without duplicating services. In addition, Partnership has appropriate agreements in place with each lead entity to ensure HIPAA mandates are followed and member data is not shared inappropriately.

Per DHCS's California Advancing and Innovating Medi-Cal (CalAIM) effective January 1, 2022, members with exceptional clinical and non-clinical needs have access to a community-based benefit called Enhanced Case Management (ECM). ECM provides coordination of services and comprehensive care management through an interdisciplinary, high-touch, person-centered care plan. Members who quality for ECM services are tracked through a shared data platform to promote communication between providers and reduce duplication of effort.

Informing Members on Interactive Content

Many of Partnership's programs and services are designed to be interactive, allowing members to select the extent to which they wish to engage in these opportunities. In all instances, members have the ability to opt out of the program. Should the member

express this wish – in writing, in a telephonic conversation, or through a face-to-face interaction – this preference is documented for each campaign or intervention. The PHM Work Plan details the interactive services offered, how members qualify for programs, and how to opt out of programs.

Program Evaluation

The Population Health department analyzes the impact of PHM programs annually through clinical, utilization, and member experience measures, in accordance with the PHM efforts of the year. Partnership's Health Analytics department takes the lead in performing quantitative analyses to monitor the cost of services and programs, utilization results in aggregate and by subpopulation, and data supporting the tracking measures identified in specific initiatives. Data gathered to perform this analysis includes advanced data sets described previously, as well as annual medical/behavioral and pharmacy claims data, transportation claims data, health appraisal results, HEDIS data, and data specific to internal programs such as case management, pilot programs, and/or provider performance improvement activities. The PHM&HE Committee reviews reports of PHM activities for potential areas of concern, opportunities for improvement, and evaluates the impact of existing programs. This allows Partnership's leadership to review and update PHM activities to meet the needs of the members, as well as identify staffing, education, system, and infrastructure changes/requirements needed to support the delivery of those services. Partnership's Quality Improvement and Performance Improvement programs use HEDIS monthly and annual reporting and analysis to monitor the impact of the programs and select opportunities for future interventions. The PHM Work Plan tracks the progress of interventions according to the measures identified at the beginning of the year, while the Population Health Management Impact Analysis reports on clinical and utilization measures, as well as member experiences with the population health interventions.

In addition, Partnership hosts quarterly committees to encourage members to engage directly with Partnership. One such committee is the Consumer Advisory Committee (CAC), made up of member representatives from each of the regions in which Partnership operates. This committee meets to review Partnership's programs and provide feedback on how Partnership is meeting the needs of the community. A separate Family Advisory Committee (FAC) is comprised of members whose children have special needs. The Pediatric Quality Committee consists of public and private sector physicians who care for Partnership members; the committee provides insight into challenges members may have in getting the care they need from a provider perspective.

The Grievances & Appeals department gathers and analyzes trends in member-reported complaints to identify areas for program improvement in the coming year. Partnership also has a process for identifying and intervening where there may be Potential Quality Issues (PQIs) related to a provider or provider organization. Finally, Partnership participates in two NCQA-approved Consumer Assessment of Healthcare Providers and Systems (CAHPS) surveys; one assesses factors under Health Plan influence, the other focuses on factors managed by Primary Care sites.

Identifying Opportunities for Improvement

No less than annually, the PHM&HE Committee evaluates the impact of PHM's programs, identifies opportunities for improvement, and selects at least one improvement opportunity to address in the coming year.

Delivery-System Supports for Population Health Management

Through PHM, Partnership acts to support providers by working intentionally and collaboratively with the provider community. The Quality Improvement department outlines strategies for the coming year in the Quality Improvement Program Description (See Policy MPQD1001) and annual Work Plan, addressing how providers will be made aware of population needs, and how they will be supported in addressing them.

Value-Based Payment Programs

Partnership has a number of value-based payment programs through which contracted provider organizations can qualify for a financial bonus for quality-related performance. There are separate incentive programs for primary care providers, hospitals, pharmacies, perinatal providers, behavioral health, palliative care, and other specialty providers. Partnership's Primary Care Provider Quality Improvement Program (PCP-QIP) is Partnership's value-based payment program for primary care providers. The PCP-QIP is largely focused on improving the quality of care members receive through a measure set reflecting Partnership's HEDIS measure score improvement priorities.

Incentivizing Patient-Centered Medical Home (PCMH) Recognition

Through our PCH-QIP, Partnership incentivizes contracted primary care practices to achieve and maintain Patient-Centered Medical Home recognition. This program is designed as an annual incentive, intended to encourage and recognize those provider practices that achieve excellent levels of service, care integration, and panel management, as recognized by established quality organizations.



Sharing Data

Partnership shares a variety of member data with our provider network in an effort to facilitate coordination of care and population health management. The two main systems for data sharing are eReports and the Partnership Quality Dashboard (PQD).

eReports

eReports is a web-based platform that supports measurement and reporting for the clinical care domain of the Core Measurement set in Partnership's PCP-QIP. These preventive care and chronic disease management measures reflect DHCS's priority quality measures and are developed in-house by Partnership. The Core Measurement set is reviewed, modified, and approved annually by Partnership's Physician Advisory Committee (PAC) after considerable input from an internal technical workgroup, an external provider advisory group, and an open comment period involving all participating providers. eReports gives providers member-level data showing member eligibility and compliance for each clinical measure leveraging claims, lab, and immunization registry

data. Providers may also upload medical record data to substantiate member compliance where representative administrative data is unavailable. eReports data are refreshed twice per week, giving providers nearly real-time visibility to their measure-specific performance relative to performance targets. It also offers the ability to drill down into member lists by measure and view measure performance by site or organizational level (i.e. if multi-site provider).

Partnership Quality Dashboard (PQD)

This secure, online platform makes provider-site-level quality data available across quality improvement programs to help inform, prioritize, and evaluate quality improvement efforts. Specifically, PQD functionality includes:

Measure-	PQD tracks provider performance on all Primary Care Provider Quality
Specific Data	Improvement Program and HEDIS measures relevant to targets.
Trended Data	Providers can track their performance on the measures throughout the
	measurement periods (i.e. monthly rates).
Comparative	PQD allows providers to compare their performance to blinded data of
Data	peer providers, including local averages and national benchmarks

Note: While the most currently available data for QIP Clinical measures is available on eReports, PQD serves as a visualization tool. PQD does not allow for any data entry. Instead, all clinical rates are calculated in eReports, and PQD takes the output of eReports, presenting the data longitudinally and comparatively. While eReports displays performance at a given point in time, PQD shows performance data trending. In addition, the eReports interface compares performance against pre-defined thresholds, whereas PQD has multiple means of comparison including averages at regional, subregional, and county levels. PQD also includes data for non-clinical measures (e.g., readmissions, PCP Office Visits).

Transformation Technical Assistance

In addition to aligned incentives and data sharing, Partnership supports quality improvement and care delivery transformation in our network via the Partnership Improvement Academy and its component offerings. These opportunities are designed to prepare providers to optimize population health, enhance their patients' experiences of care, promote provider and care team satisfaction, and foster a culture of continuous quality improvement. The Academy offerings include the ABCs of QI (QI basic

methodology for the model for improvement) and personalized services through Quality's Improvement Advisors, who work directly with provider sites to provide support, guidance, and tailored recommendations in support of practice transformation and the development of quality improvement subject matter expertise.

Population Health and Health Education Delegation Oversight and Monitoring

Partnership delegates activities for both Population Health and Health Education. A formal agreement is maintained and inclusive of all delegated functions. Partnership conducts an audit of all delegated entities no less than annually to ensure the appropriate policies and procedures are in place. Results from Oversight and Monitoring activities are presented to the Delegation Oversight Review Sub-Committee (DORS) for review and approval.

Population Health Department Structure

Population Health operations are supported by a leadership team and administrative staff. Partnership's Population Health department is responsible for developing, maintaining, and overseeing implementation of Partnership's overall PHM strategy, identifying the health disparities and wellness needs of Partnership's members, and aligning organizational and community efforts to meet these needs, in accordance with DHCS and NCQA requirements. In order to accomplish these objectives, Population Health departmental resources are leveraged to engage internal stakeholders, external stakeholders, and members aligning existing projects and efforts to promote health equity for Partnership's population. Population Health department staff are allocated to develop and share member education materials, ensure all member subpopulations have resources specific to their needs, engage with the community, educate community partners on Partnership programs and interventions, learn about resources available within communities, promote collaboration of effort, and reduce duplication of services.

Team Roles and Responsibilities

Senior Director of Health Services:

At the senior level, provides overall direction to the Heath Services (HS) Care Coordination/Population Health/Utilization Management Leadership Team. This position has the ultimate responsibility of ensuring that departmental programs and services are consistent and meet all regulatory requirements in every office location.

Director of Health Equity (Health Equity Officer)

In collaboration with other Partnership leaders, develops and drives forward the key strategies helping Partnership be a diverse, equitable, and inclusive organization. Works to raise awareness of health inequities within Partnership's staff, providers, and membership, and creates concrete plans for addressing them. Works closely with the Senior Director of Health Services, Quality, Human Resources, Provider Relations and Population Health departments toward shared goals, and with other internal and external Partnership stakeholders to ensure high standards equitability.

Director of Population Health

Provides oversight of Population Health strategy, programs and services to improve the health of Partnership members. Works with the Chief Medical Officer, Senior Director of Health Services, Senior Director of Quality and Performance Improvement, Director of Health Equity, and other department leaders to meet organization and department goals and objectives while developing and tracking the measurable outcomes of department services.

Associate Director of Population Health

Assists the Director of Population Health in the development, implementation and evaluation of PHC's population health interventions and program oversight. The Associate Director oversees the Managers of Population Health and the operational workings of the Population Health department. The Associate Director reviews and submits issues, updates, recommendations, and information to the HS Leadership when appropriate. Ensures ongoing audit readiness for Population Health deliverables.

Manager of Population Health

The Manager of Population Health gives day-to-day direction and has management responsibility for the implementation of member-facing outreach campaigns, member wellness coaching, and other member and community-facing activities designed to keep members healthy and support them in managing their emerging health risks. The

Manager provides day-to-day direction for supervisors, manages escalated concerns, and ensures ongoing audit readiness for Population Health deliverables within the scope of their assigned unit.

Supervisor of Population Health

Provides supervisory oversight during daily department operations for assigned team members through sustained leadership and support. Using best expertise and sound judgment (and in consultation with clinical leaders, providers, and staff), provides daily oversight, leadership, support, training, and direction of Population Health staff. Supports and assists the Manager and other Supervisors in developing and maintaining a cohesive team with a high level of productivity and accuracy to achieve the department's overall performance metrics.

Senior Health Educator

A masters-prepared (or MCHES-certified) professional who ensures the delivery of health education resources for both members and primary care providers. Collaborates on the creation of trainings for contracted providers and internal Partnership staff to promote cultural competency, health equity, and member wellness. Responsible for preparation and implementation of the PNA and the C&L Work Plan. Monitors and provides administrative oversight of all regulatory requirements related to Health Education and the Cultural & Linguistics programs. Provides assistance with regulatory requirements as needed.

Health Educator

Trained and competent to actively participate in the design and implementation of the Health Education Program. Assesses the health education needs of internal staff, leads on assigned member education projects, monitors health education materials, performs literacy reviews to ensure appropriate readability and suitability levels, and evaluates member grievances. Serves as a resource to internal staff and providers to ensure compliance with state requirements for educational member materials.

Healthy Living Coach

Engages Partnership members to identify barriers to care, member concerns, and resources needed. Leads member wellness courses and supports members using Partnership's Healthy Living Tools. Participates in health fairs and other activities where Partnership members congregate; shares learning with other Partnership departments who promote member engagement and wellness. When applicable, refers to culturally and linguistically appropriate community services.

Community Outreach Representative

Identifies and participates in provider and member educational opportunities for internal departments, external agencies/community-based organizations, community advisory groups, and trainings. Provides hands-on support to the internal team, and Partnership providers, community partners, and members. Identifies community service programs available within our counties, outlining resources that are culturally and linguistically appropriate. Makes these resources available on Partnership's external website.

Wellness Guide

Performs outbound call campaigns to members based on identified member needs (e.g., pregnant members, members impacted by natural disasters, etc.) using appropriate scripts. Administers post-campaign surveys. Helps members identify and access resources for their health and social support needs. Tracks outreach efforts in approved database/tracking system, per prescribed protocols. When applicable, refers to culturally and linguistically appropriate community services.

Project Manager

Responsible for managing timelines and deliverables in department projects. Develops agendas and leads meetings to advance departmental objectives. Provides routine and ad hoc reporting for key Population Health activities and initiatives. Works closely with designated department staff and leadership to gather, compile, and distribute reports, and facilitates structured file and record management. Supports ongoing audit readiness activities by maintaining structures around audit deliverables.

Project Coordinator

Oversees timelines and deliverables for department projects. Provides routine and ad hoc reporting for key Population Health activities and initiatives. Works closely with designated department staff and leadership to gather, compile, and distribute reports, and facilitates structured file and record management. Supports ongoing audit readiness activities by maintaining structures around audit deliverables, meeting minutes, and the file retrieval system.

Coordinator

Provides coordination and administrative support to their manager and assigned unit. Performs a variety of general clerical duties, including data entry, help desk management, referral tracking, the distribution of non-monetary member incentives to members participating in incentive programs, organizing member packets and gifts, etc.

Note: Staffing is subject to change based upon program needs and organizational growth.

References

DHCS APL 18-016 Readability and Suitability of Written Health Education Materials (10/05/2018)

Document A (APL 18-016): <u>Review and Approval Guidance for Written Health</u> Education and Member Information Materials

Document B (APL 18-016): Readability and Suitability Checklist for Written Health Education materials

DHCS APL 16-005 Revised Requirements for Use of Non-Monetary Member Incentives for Incentive Programs, Focus Groups, and Member Surveys (11/23/2016)

NCQA. (2018). Population Health Management / Resource Guide. www.ncqa.org.

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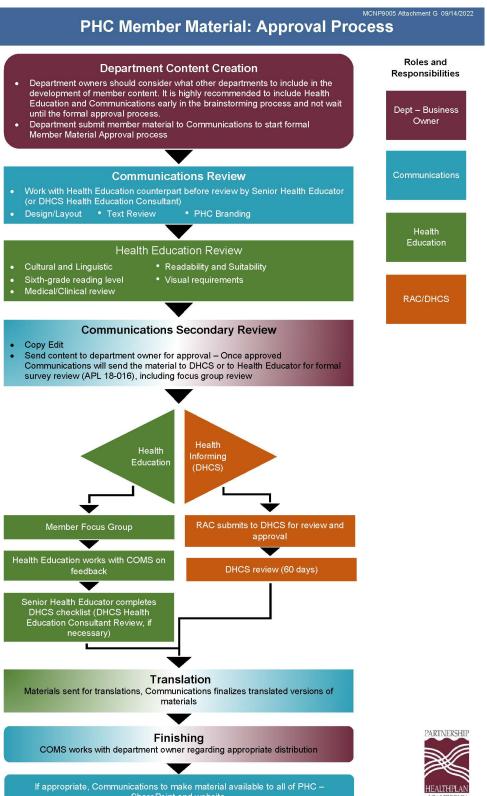
Snyder, A. M., Willey, C., McKenna, M., Foley, P., & Coleman, R. (2005). Development of a Risk Assessment Tool for Predicting Pediatric Health Services Utilization. *Journal of Clinical Outcomes Management*, 451-458.

Population Health Management Strategy & Program Description Approval

Rh 2 Mon	8/9/2023
Robert Moore, MD, MPH, MBA	Date Approved
Quality/Utilization Advisory Committee Chairperson	
5/2/2010	8/9/2023
Steve Gwiazdowski, M.D.	Date Approved
Physician Advisory Committee Chairperson	
Alicia Hardy	8/23/2023
Alicia Hardy, LCSW	Date Approved

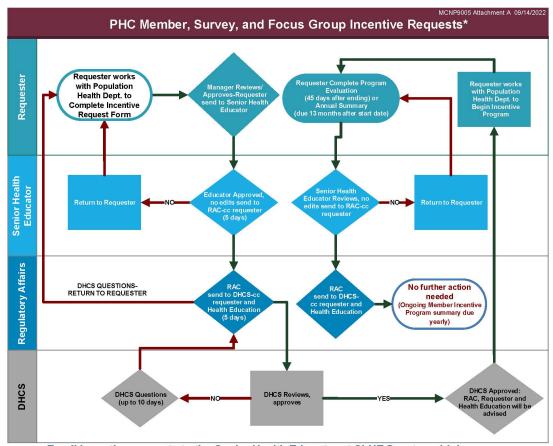
Board of Commissioners Chairperson

Appendix A





Appendix B



Email incentive requests to the Senior Health Educator at CLHE@partnershiphp.org

*As referenced by MMCD All Plan Letter (APL) 16-005 Revised