



Policy:	AA.1275
Title:	<b>Department of Health Care Services (DHCS) File and Use Submission Process</b>
Department:	Office of Compliance
Section:	Regulatory Affairs & Compliance
<i>CEO Approval:</i>	<i>/s/ Michael Hunn 11/19/2024</i>
Effective Date:	05/05/2022
Revised Date:	11/07/2024
Applicable to:	<input checked="" type="checkbox"/> Medi-Cal <input type="checkbox"/> OneCare <input type="checkbox"/> PACE <input type="checkbox"/> Administrative

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## I. PURPOSE

This Policy outlines CalOptima Health's process for Department of Health Care Services (DHCS) File and Use materials submissions.

## II. POLICY

A. CalOptima Health may submit the following applicable Medi-Cal materials to DHCS through the File and Use submission process:

1. Policies not required by DHCS, by contract or an All Plan Letter (APL) requirement.
2. Policies (including policy attachments), with minor revisions required by DHCS that do not impact CalOptima Health's compliance with all legal and contractual requirements, DHCS policy, and DHCS guidance. Examples of these minor revisions include but may not be limited to:
  - a. An adjustment of internal timelines or functions between CalOptima Health departments that do not impact DHCS contractual requirements;
  - b. Rearrangement of policy and procedure language that does not alter policy intent, or impact DHCS contractual requirements;
  - c. Revisions to grammar or punctuation, or updates to glossary terms, or references;
  - d. Updates to phone numbers or addresses; and
  - e. Language clarifications that do not substantively change the Policy, such as revising 'working' to 'business' days.
3. Redline versions of minor changes to deliverables/submissions that were already reviewed and approved by the DHCS within the last six (6) months and do not impact CalOptima Health's compliance with all legal and contractual requirements, DHCS policy, and DHCS guidance. Examples of these minor revisions may include but are not limited to:

- a. An adjustment of internal timelines or functions between CalOptima Health departments that do not impact DHCS contractual requirements;
  - b. Updates to phone numbers or addresses;
  - c. Grammatical or punctuation updates; and
  - d. Page reference updates to previously approved Member Material Approval (MMA) documents.
4. Consent forms (i.e., authorized representative forms, minor consent forms)
- B. By contract, DHCS reserves the right to review, modify, stop, approve, deny CalOptima Health's right to use, or require CalOptima Health to edit, submitted materials at any time.

### **III. PROCEDURE**

- A. If materials have met the requirements for DHCS' File and Use flexibilities in accordance with Section II.A. of this Policy, Departments shall submit File and Use materials as follows:
- 1. Policies
    - a. Policy Owners shall submit the following to the Regulatory Affairs & Compliance Policies and Procedures (RAC P&P) team:
      - i. Revised policy, attachment(s) if applicable, and the Policy Intake Form [PIF]; and
      - ii. Any additional required documents in accordance with the CalOptima Health Policy Owner Manual.
    - b. Upon receipt of the completed submission, the RAC P&P team will verify readiness, and coordinate with the Regulatory Affairs & Compliance Medi-Cal (RAC Medi-Cal) team for File and Use submission to DHCS.
    - c. The RAC Medi-Cal team will submit the signed DHCS Medi-Cal Managed Care Plan File and Use Attestation Form and the revised policies to DHCS as File and Use.
  - 2. Deliverables/Submissions
    - a. The department responsible for the specific deliverables/submissions shall submit the following to the RAC Medi-Cal team:
      - i. Redline versions of all minor changes to deliverables/submissions from the responsible department.
      - ii. Upon receipt of the completed submission, the RAC Medi-Cal team will verify readiness and submit the signed DHCS Medi-Cal Managed Care Plan File and Use Attestation Form and revised deliverables/submissions to DHCS as File and Use.

3. Upon review of materials listed in Sections III.A.1 and III.A.2, the RAC Medi-Cal and RAC P&P teams reserve the right to reclassify materials if deemed inappropriate for submission as a File and Use material.

**B. Attestation Form**

1. The completed Medi-Cal Managed Care Plan File and Use Attestation Form is required to accompany each submission and must be completed when CalOptima Health intends to use or implement any CalOptima Health materials prior to DHCS review and approval (File and Use).
2. The Attestation Form must be signed by CalOptima Health's Chief Executive Officer (CEO), Chief Operating Officer (COO), or Chief Compliance Officer (CCO), or an individual who reports directly to the CEO, COO, or CCO with delegated authority to sign for the CEO, COO, or CCO, so that the CEO, COO, or CCO is ultimately responsible for the Attestation Form.

**IV. ATTACHMENT(S)**

- A. DHCS File and Use Attestation Form
- B. Policy Intake Form [PIF]

**V. REFERENCE(S)**

- A. CalOptima Health Contract with the Department of Health Care Services (DHCS) for Medi-Cal
- B. CalOptima Health Policy Owner Manual
- C. Department of Health Care Services (DHCS), [Medi-Cal]: File and Use Flexibilities Memo

**VI. REGULATORY AGENCY APPROVAL(S)**

Date	Regulatory Agency	Response
06/08/2022	Department of Health Care Services (DHCS)	File and Use

**VII. BOARD ACTION(S)**

Date	Meeting
05/05/2022	Regular Meeting of the CalOptima Board of Directors
11/07/2024	Regular Meeting of the CalOptima Health Board of Directors

**VIII. REVISION HISTORY**

Action	Date	Policy	Policy Title	Program(s)
Effective	05/05/2022	AA.1275	Department of Health Care Services (DHCS) File and Use Submission Process	Medi-Cal
Revised	09/01/2023	AA.1275	Department of Health Care Services (DHCS) File and Use Submission Process	Medi-Cal
Revised	11/07/2024	AA.1275	Department of Health Care Services (DHCS) File and Use Submission Process	Medi-Cal

## IX. GLOSSARY

Term	Definition
Department of Health Care Services (DHCS)	The single State Department responsible for administration of the Medi-Cal program, California Children's Services (CCS), Genetically Handicapped Persons Program (GHPP), and other health related programs as provided by statute and/or regulation.
File and Use	A submission to DHCS that does not need review and approval prior to use or implementation, but which DHCS can require edits as determined.
Policy	For purposes of this policy, a formal document that communicates broad principles of operation and standards on a particular subject to guide the actions and decision-making of individuals. Desktop policies and procedures are not included.
Policy Owner	For purposes of this policy, the Director-level staff member who has lead responsibility for the policy and procedure, as part of his/her job duties.