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Promise Health Plan

Summary of Delegation Model

Effective 1/1/2024

## SUMMARY OF DELEGATION MODEL

Blue Shield of California Promise Health Plan (BSCPHP) understands that Delegation Oversight is a critical component of ensuring a culture of compliance. We use the guidance provided by the Department of Health Care Services (DHCS) to distinguish between Fully Delegated, Partially Delegated, and Administrative Subcontractors/Downstream Subcontractors.

The distinction allows us to provide appropriate oversight for all types of Subcontractors. The Director of Medi-Cal Performance and Optimization is responsible for the Subcontractor Oversight program within BSCPHP. This program is broken down into three distinct focus areas of oversight:

- Internal Tracking – provides tracking and monitoring of the functions performed either within BSCPHP or Blue Shield of California.
- Vendor Oversight – provides oversight of external administrative functions that support BSCPHP operations.
- Delegation Oversight – provides oversight of our partially and fully delegated entities that directly impact our members.

The Delegation Oversight focus area is driven primarily by the Director of Delegation Oversight with a defined escalation path for issues that need broader support.

Both Vendor Oversight and Delegation Oversight report into Subcommittees of our Quality Oversight Committee (QOC), Vendor Oversight Committee (VOC) and Delegation Oversight Committee (DOC) respectively. The QOC then reports overall quality oversight activities to the Board of Directors.

To support the program's objectives, BSCPHP provides pre-delegation assessments and ongoing oversight of the following services:

- Claims Payment and Processing
- Credentialing and Recredentialing
- Utilization Program Management
  - Prior Authorizations and Review Procedures
  - Timeframes and Medical Authorization
  - Review of Utilization Data
  - Delegated UM Activities