



Policy and Procedure No: PR 21.3	Revision No: 3
Division: Care Management	
Department: Provider Relations	
Title: PHC-CA CalAIM Oversight of ECM Providers	
Effective Date: 1/1/2022	
Supersedes Policy No: PR 21.0, PR 21.1, PR 21.2	
Reviewed/Revised by: Sandy Johansson	Review/Revision Date: 10/3/2025
Approving Committee: Member Provider Committee	Date: 12/15/2025
Executive Oversight Committee Date: 12/16/2025	

Purpose:

To describe how PHC California (the Health Plan) conducts oversight and monitoring of Enhanced Care Management (ECM) providers.

Policy:

1. With the approval of the Department of Health Care Services (DHCS), the Health Plan has selected AIDS Healthcare Foundation (AHF) Care Management to serve as the Health Plan's ECM Provider. The Health Plan conducts monitoring and oversight of ECM services in accordance with the DHCS ECM Policy Guide.
2. For such time as AHF Care Management serves as the Health Plan's ECM provider, the following ECM requirements are not applicable:
 - a. Credentialing ECM providers for whom there is no Medicaid enrollment pathway
 - b. Using ECM provider Standard Terms and Conditions to develop ECM contracts.
 - c. Holding ECM providers responsible for the same reporting requirements as those the Health Plan has with DHCS.
 - d. Imposing mandatory reporting requirements that differ from or are additional to those required for encounter and supplemental reporting.
 - e. Utilizing tools developed or promulgated by NCQA to perform oversight of ECM Providers.
 - f. Providing ECM training and technical assistance to ECM Providers, including in-person sessions, webinars, and/or calls, as necessary.

Procedure:

1. The National Director of Care Management or designee meets with Care Management staff on a weekly basis to review the status of current ECM caseload and outreach to potential candidates for ECM services.
2. As needed, the Compliance Officer or designee conducts audits and/or imposes corrective action plans in accordance with the Health Plan's internally established auditing and monitoring procedures as described in Compliance Policy and Procedures PHC-CA Monitoring and Auditing and PHC-CA Response to Detected Offenses and Corrective Action Plans.

Definitions:

1. CalAIM: California Advancing and Innovating Medi-Cal: DHCS' multi-year initiative to implement overarching policy changes across all Medi-Cal delivery systems with the following objectives:
 - a. Identify and manage member risk and need through Whole Person Care Approaches and addressing Social Determinants of Health;
 - b. Move Medi-Cal to a more consistent and seamless system by reducing complexity and increasing flexibility; and
 - c. Improve quality outcomes, reduce health disparities, and drive delivery system transformation and innovation through value-based initiatives, modernization of systems, and payment reform.
2. Corrective action: The response of The Plan to potential violations relating to misconduct.
3. Enhanced Care Management (ECM): A collaborative and interdisciplinary benefit to provide intensive and comprehensive ('whole-person') care management services to high-need Medi-Cal beneficiaries.
4. ECM Provider: A Provider of ECM. ECM Providers are community-based entities with experience and expertise providing intensive, in-person care management services to individuals in one or more of the Populations of Focus for ECM.
5. Model of Care: the ECM and ILOS Model of Care (MOC) is Contractor's framework for providing ECM and ILOS, including its Policies and Procedures for partnering with ECM and ILOS Providers. The ECM and ILOS Model of Care Template (MOC Template) is the document that details the MOC. Contractor must submit its MOC Template to DHCS for review and approval prior to ECM and ILOS implementation. ECM and ILOS Provider contracts must incorporate the MOC requirements as described in ECM Section 5: Model of Care.

Monitoring:

This policy is updated as often as necessary and reviewed and approved at least annually by the Member Provider Committee.

Reference(s):

1. DHCS Contract 23-30211 A03, Section 4.4, Enhanced Care Management.
2. [CalAIM](#) Enhanced Care Management [Policy Guide](#), Updated August 2024.
3. PHC California Policy and Procedure CO 7, Auditing and Monitoring.
4. PHC California Policy and Procedure CO 8, Response to Detected Offenses and Corrective Action Plans