



Policy and Procedure No: CO 13.1		Revision No: 1
Division: Care Management		
Department: Compliance		
Title: PHC-CA DHCS and DMHC All Plan Letters, Policy Letters, and Regulatory Requirements		
Effective Date: 4/25/2023		
Supersedes Policy No: CO 13.0		
Reviewed/Revised by: Sandra Holzner		Review/Revision Date: 12/13/2025
Approving Committee: Compliance Committee		Date: 12/15/2025
Executive Oversight Committee Date: 12/16/2025		

Purpose:

The Department of Health Care Services (DHCS) and the Department of Managed Health Care (DMHC) provide specific guidance and information to health plans. DHCS and DMHC will issue new rule-making or interpretative guidance which can involve statutory and regulatory changes. Such communications may update the guidance provided by DHCS and DMHC and are communicated to PHC California (the Plan) via All Plan Letters (APLs).

The Health Plan must have an effective way to communicate information from the Compliance Officer to others. The dissemination of information from the Compliance Officer must be made within a reasonable time and to all appropriate parties.

Policy:

The Compliance Department must have and maintain an effective method of communicating and tracking new regulations, regulatory changes or changes relevant to the Health Plan. that are communicated to the Plan from DHCS and DMHC in the form of All Plan Letters and Policy Letters to ensure timely implementation.

The Health Plan ensures that its subcontractors and network providers are informed of and comply with all relevant state and federal laws, contract requirements, and other DMHC and DHCS guidance, including All Plan Letters and Policy Letters.

Procedure:

- I. All Plan Letter Process Review
 - A. After the Compliance Department receives an All Plan Letter, the Compliance Department will analyze the contents of the APL in order to examine any possible implications upon the plan and provide an interpretation of the All Plan Letter.
 - B. Compliance shall classify the All Plan Letter as either: Informational or Actionable.
 - C. Compliance shall determine the criticality of the All Plan Letter into the following designations: High, Medium, or Low.
- II. Communication of the All Plan Letter to Departments
 - a. Compilation of All Plan Letter, Analysis, and Summary

1. The Compliance Department will compile the summary and the original All Plan Letter electronically.

a) A summary of the All Plan Letter will include the following:

- (1) Summary
- (2) Criticality
- (3) Crucial Deadlines
- (4) Next Steps

2. Compliance will distribute the All Plan Letter as soon as they are received, typically within five (5) working days of receipt.

b. All Plan Letter Distribution List

1. The All Plan Letter and Summary e-mail are sent to the appropriate areas impacted and as detailed in the APL Distribution List.
2. The All Plan Letter distribution list shall be updated to ensure the appropriate parties in each department receive the communications.
3. Compliance shall target distribution to the areas impacted by the regulation communication in the All Plan Letter.

III. Monitoring All Plan Letter Implementation

a. Meetings will be utilized to follow up on actionable Memo's.

1. Compliance shall document meeting minutes.

b. Compliance shall confirm that action has been taken and has been implemented.

c. Business Owners will be responsible for implementing an action and will be required to provide documentation that the action has been updated. Compliance will review any documents to validate that the implementation has occurred.

Examples of Validation of Implementation:

1. Revised Policies and Procedures (approved versions only).
2. Screen shots of updated processes.

IV. Recordation of the All Plan Letter Topic

- a. The Compliance Department shall maintain a Compliance Regulatory Log.
 1. The Compliance All Plan Letter log shall contain the following information:
 - a) All Plan Letter topic
 - b) Date All Plan Letter was published.
 - c) Summary
 - d) Next Steps
 - e) Date of All Plan Letter Distribution
 - f) Criticality (High, Medium, or Low)
 - g) Whether Memo is Actionable or Informational
 - h) If the All Plan Letter is actionable, whether a process was implemented.
 - i) Validation of Implementation
 - j) Responsible Business Owner

V. Subcontractors and Downstream Entities

- a. Should Subcontractors or Downstream Subcontractors be impacted by the regulatory changes, the Compliance Department will work with departments responsible for the oversight of the Subcontractors or Downstream Subcontractors to ensure that the message is communicated, and outstanding issues are resolved timely.

VI. New Regulatory Guidance not communicated in an All Plan Letter or Policy Letter

All new regulatory guidance that is not communicated to the Health Plan via an All Plan Letter or Policy Letter will be disseminated to the Business Owners or Subject Matter Experts (SME's) with the Care Management Division. Relevant due dates and updates required to Policies and Procedures will be tracked by Compliance either via the Regulatory Log or Report Manager to ensure that any updates are made to policies and procedures and operationalized.

Definitions:

1. AHF: AIDS Healthcare Foundation and its affiliates/subsidiaries who offer Care Management health plans or programs.
2. All Plan Letter (APL) or Policy Letter (PL): means a binding document that has been dated, numbered, and issued by Department of Health Care Services (DHCS) that provides clarification of



Health Plan’s contractual obligations, implementation instructions for Health Plan’s contractual obligations due to changes in State and federal law or judicial decisions, and/or guidance with regulatory force and effect when DHCS interprets, implements, or makes specific relevant State statutes under its authority.

3. Downstream Subcontractor: means an individual or an entity that has a Downstream Subcontractor Agreement with a Subcontractor or a Downstream Subcontractor. A Network Provider is not a Downstream Subcontractor solely because it enters into a Network Provider Agreement.
4. Subcontractor: means an individual or entity that has a Subcontractor Agreement with Contractor that relates directly or indirectly to the performance of Contractor’s obligations under this Contract. A Network Provider is not a Subcontractor solely because it enters into a Network Provider Agreement.

Monitoring:

This policy is updated, as necessary, reviewed and approved annually by the Care Management Compliance Committee.

References:

DHCS Managed Care Contract

Regulatory Agency Approval(s):

Date	Version	Regulatory Agency	Purpose	Response
Not avail.	13.0	Department of Health Care Services (DHCS)	2024 Operational Readiness R.0022	Approved
10/24/2024	13.1	Department of Health Care Services (DHCS)	APL 24-008 AIR1	Approved
	13.1	Department of Health Care Services (DHCS)	MCOD Portal D.0330.2	Approved
3/19/2025	13.1	Department of Managed Health Care (DMHC)	Filing No. 20240216	

