

## Network Provider Update

To: Medi-Cal network participants

April 2024

From: Melinda Kjer  
Director, Provider Relations and Contracting

Subject: **All Plan Letter 24-002: Medi-Cal Managed Care Plan Responsibilities for Indian Health Care Providers and American Indian Members**

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The Department of Health Care Services (DHCS) recently issued [All Plan Letter \(APL\) 24-002](#), "Medi-Cal Managed Care Plan Responsibilities for Indian Health Care Providers and American Indian Members." We are sharing a summary of this APL with you to ensure you are aware of the information, and you can apply the information to your practice or facility operations, where appropriate.

APL 24-002 contains guidance related to healthcare options for American Indian Medi-Cal members and protections for Indian Health Care Providers (IHCPs). Managed care plans (MCPs) such as Blue Shield of California Promise Health Plan are advised about requirements for contracting with IHCPs, reimbursing claims, and setting up a tribal liaison.

### APL summary

- American Indian Medi-Cal members:
  - Do not have to enroll in an MCP, except in the case of County Organized Health Systems (COHS) or Single Plan Model counties. Voluntarily enrolled American Indian members can unenroll at any time and receive treatment on a fee-for-service (FFS) basis.
  - Can receive services from an IHCP and choose an IHCP within the MCP network as their primary care physician. They can also receive services from out-of-network IHCPs without needing a referral or prior authorization.
  - Are not subject to any MCP fees, premiums, copayments, cost sharing, or types of charges, and MCPs may not reduce payments to IHCPs to make up for these.
- Indian Health Care Providers (IHCPs):
  - IHCP facilities must enroll in Medi-Cal through the state-level enrollment pathway in order to receive reimbursement at the All-Inclusive Rate or Prospective Payment System, and to receive Medi-Cal FFS reimbursement for MCP carved-out services, such as dental services.
  - Any individual practitioner who provides services at an IHCP facility must be enrolled in Medi-Cal as an Ordering, Referring, and Prescribing (ORP) Provider.
  - Do not have to contract with an MCP to be reimbursed for providing services to an American Indian MCP member.
- Managed Care Plans (MCPs):
  - Cannot require that Tribal Health Programs be licensed. Nor can they require practitioners at a Tribal Health Program be licensed if they are already licensed in another state.
  - Cannot require IHCPs to service MCP members who aren't eligible for IHCP services.
  - Cannot require IHCPs to be insured or hold the MCP harmless from liability.
  - Are responsible for credentialing, re-credentialing, and site reviews of contracted IHCPs.

- Are advised to pay claims expeditiously and in accordance with federal law, and to reimburse IHCPs for transporting American Indian MCP members to an IHCP.
- Contracts with IHCPs must be governed by federal law. Additional contracting information can be found in the [2016 CMCS Informational Bulletin](#).
- Effective January 1, 2024, MCPs are advised to identify a tribal liaison to work with each IHCP in their service area. The APL explains the various responsibilities of the tribal liaison role.

Blue Shield Promise has designated **Melinda Myer** as our tribal liaison. She can be reached at [ProviderRelations\\_SD@blueshieldca.com](mailto:ProviderRelations_SD@blueshieldca.com).

This summary is only meant as a brief description of the APL. Please see the APL itself for additional background and the complete requirements. The full text of APL 24-002 may be found at this URL: <https://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL%202024/APL24-002.pdf> (Links to the DHCS.ca.gov website will take you off of the Blue Shield Promise website.)

If you have questions about applying a benefit to American Indian members, please contact Blue Shield Promise Provider Services via Live Chat after logging in at [www.blueshieldca.com/provider](http://www.blueshieldca.com/provider) or call **(800) 468-9935** from 6 a.m. to 6:30 p.m., Monday through Friday.