



Part I Section 9

Compliance

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CCHCA Compliance Program

CCHCA expects all member physicians and contracted providers to be in full compliance with current Medicare Fraud, Waste, and Abuse (FWA) regulations. CCHCA Physicians and their office staff are required to complete yearly FWA training to stay up-to-date and be trained on how to identify compliance issues. CCHCA has training materials and attestation forms available on CCHCA's main website at <http://cchca.com/fraud-and-abuse-training.php>. Once you and your staff have completed the required training, please submit your training attestation form to CCHCA promptly.

It is understood that many providers participate in more than one health plan's Medicare network. **Providers will only need to take the training once a year to satisfy the requirement for all the plans with which they contract. If you have already completed the FWA training provided by another Medicare Advantage Plan, you can use that training to satisfy this requirement.**

You must document the names of the individuals who received training, the date of the training and the source of the training and keep it on file in the event of an audit by CMS or third party auditors. Documentation of annual training will be reviewed during CCHCA site review visits or recredentialing.

Physicians who do not provide adequate attestation showing their completion of the required FWA training, will not be eligible to receive their withhold payments (based on contracted fee schedule) of the respective year.



CCHCA Compliance Hotline

Non-Compliance to Fraud, Waste and Abuse regulations is a serious matter.

If you discover any potential compliance issues regarding Medicare non-compliance or fraud, waste or abuse, you need to report such issues to CCHCA's Compliance Officer immediately. Non-compliance has the potential to cause harm to patients.

CCHCA physicians, medical office staff, employees and contractors may report issues through any of the following channels. For the quickest response, it is recommended to report compliance issues to CCHCA Compliance Officer via the Compliance Hotline:

CCHCA COMPLIANCE HOTLINE: Phone: (415) 216-0095

Email: cathy.chan@cchca.com

Or you may also contact the following if applicable:

- The employee's immediate supervisor or manager;
- The contractor's Compliance Officer, if they have one



DMHC Timely Access Regulations

The following are timely access requirements as mandated by the Department of Managed Health Care (DMHC):

Timely Access Regulations – Appointment Availability Standards	
Appointment Type	Must Offer the Appointment Within
Non-urgent appointments with Primary Care Physicians	10 business days of request
Non-urgent appointments with Specialist Physicians	15 business days of request
Urgent care appointments that do not require prior authorization	48 hours of request
Urgent care appointments that require prior authorization	96 hours of request
Non-urgent appointments for ancillary services (for diagnosis or treatment of injury, illness or other health condition)	15 business days of request

Behavioral Health - Appointment Access Standards	
Appointment Type	Must Offer the Appointment Within
Non-urgent appointments with a physician mental health care provider	10 business days of request
Non-Urgent Care appointments with a non-physician mental health care provider	10 business days of request
Urgent Care appointments	48 hours of request
Access to Care for Non-Life Threatening Emergency	Within 6 hours
Access to Life-Threatening Emergency Care	Immediately
Access to Follow Up Care After Hospitalization for mental illness	Must Provide Both: One follow-up encounter with a mental health provider within 7 calendar days after discharge, and One follow-up encounter with a mental health provider within 30 calendar days after discharge.



After –Hour Access

When the office is closed, it is expected that each Primary Care Physician and Behavioral Health Specialists office’s automated message or answering service will provide appropriate emergency instructions and will have a healthcare professional available to return patient calls **within 30 minutes** for situations where the patients perceives their issues as urgent. Guidelines are:

- **Emergency instructions** inform the patient to call 911 or go to the nearest emergency room.
- **Urgent care instructions** inform the patient a healthcare professional will **return** their call within **30 minutes**.



After Hours Instructions

CCHCA requires that each primary care physician's and behavioral health specialist's office's automated message or answering service to provide appropriate after hours emergency instructions and will have a healthcare professional available to return patient calls within 30 minutes. Every after-hours caller is expected to receive emergency instructions, whether a line is answered live or by recording. Callers with an emergency are expected to be told to hang up and dial 911, or to go to the nearest emergency room.

The following below are the appropriate instructions to provide to a patient by your answering service or answering machine during an emergency situation:

- 1) Hang-up and dial 911 or go to the nearest emergency room.**
- 2) Go to the nearest emergency room**
- 3) Hang-up and dial 911**

The following below are the appropriate instructions to provide to a patient by your answering service when a patient calls with an urgent need to reach a physician:

- 4) Stay on the line and you will be connected to the physician or an on-call physician.**
- 5) Leave your name and phone number and the physician or an on-call physician will return your call within 30 minutes.**
- 6) Provide another phone number or pager number to contact physician or an on-call physician and that the physician/on-call physician will return their call within 30 minutes.**

The following below are the appropriate instructions to provide to a patient on your answering machine when a patient calls with an urgent need to reach a physician:

- 1) Provide another phone or pager number to contact physician or an on-call physician and that the physician/on-call physician will return their call within 30 minutes.**