



July 24, 2020

Dan Southard  
Deputy Director, Office of Plan Monitoring  
Department of Managed Health Care  
980 9<sup>th</sup> Street, Suite 500  
Sacramento, CA 95814

VIA ELECTRONIC MAIL:  
[Dan.Southard@dmhc.ca.gov](mailto:Dan.Southard@dmhc.ca.gov)

**Re: Measure Year 2020 Timely Access Provider Appointment Availability Survey**

Dear Mr. Southard:

The California Association of Health Plans (CAHP) represents 46 public and private health care service plans (plans) that collectively provide coverage to over 28 million Californians. America's Physician Groups (APG) is the leading national professional association representing accountable physician organizations who share financial responsibility for patient outcomes with payers. APG represents over 300 such organizations across the nation, serving 40 million patients.

While CAHP acknowledges that in response to the May 28<sup>th</sup> letter that was submitted on behalf of the health plans, after consulting with APG, we are jointly writing to ask the Department of Managed Health Care (DMHC) to reconsider its prior position and suspend the Measure Year (MY) 2020 Provider Appointment Availability Survey (PAAS). There is resurgence in the rate of COVID-19 cases and we do not believe administering the PAAS would be appropriate at this time.

Many providers are limiting in-person office visits for services that can *only* be performed in an office to ensure the health and safety of the provider, office staff, and patients. Many provider office staff may be working remotely and providers are largely using telehealth to triage appointment requests. Some provider groups are also only booking entire patient populations for the current month and following month only to ensure social distancing and are at capacity due to coronavirus patient and healthcare staff safety protocol. This pandemic continues to strain the healthcare delivery system and we strongly believe it would be prudent to suspend the PAAS for this year for these reasons.

Health plans will continue to monitor appointment availability through existing oversight mechanisms. Additionally, both health plans and delegated medical groups have been working diligently to continue to provide care to our patients.

We appreciate your consideration of this request and look forward to having a more extensive discussion.

Sincerely,

A handwritten signature in blue ink that reads "Christina Wu". The signature is written in a cursive style.

Christina Wu  
Director of Regulatory Affairs  
California Association of Health Plans

A handwritten signature in blue ink that reads "Bill Barcellona". The signature is written in a cursive style.

Bill Barcellona  
Executive Vice President Government Affairs  
America's Physician Groups