



August 7, 2026

Welcome to America's Physician Groups' *California Update*. Each week APG reports the latest on health care happenings in the Golden State.

Here's what you'll find in this week's edition:

- APG Comments On DMHC Draft Guidance [Protecting Employee Privacy](#)
- DHCS Outlines Implementation of [Ordering, Referring, And Prescribing \(ORP\) Requirements](#); APG Seeks Member Input
- DHCS Schedules CY 2025 [MLR Meeting](#) for August 27: Register Today!
- Register For The [August 11 California Med-Cal Forum](#)
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APG Comments On DMHC Draft Guidance Protecting Employee Privacy

APG submitted [comments](#) this week on the Department of Managed Health Care's draft [All Plan Letter](#) addressing the identification of health plan representatives in grievance acknowledgement letters. While supporting the Department's effort to protect employee privacy and safety, APG urged the Department to adopt a practical, performance-based approach that ensures enrollees have prompt access to knowledgeable utilization management staff through dedicated, well-staffed communication channels, rather than requiring direct access to an individual employee.

APG also encouraged the Department to clarify that the same employee safety principles should apply to authorization denial notices and other utilization management communications, where physician organizations performing delegated utilization management functions face similar risks. Drawing on the operational experience of APG.



DHCS Outlines Implementation of Ordering, Referring, And Prescribing (ORP) Requirements; APG Seeks Member Input

APG participated in DHCS's July 30 statewide Town Hall on implementation of the federal Ordering, Referring, and Prescribing (ORP) provider enrollment requirements. The Department described the initiative as a **multi-year, enterprise-wide implementation effort** that will ultimately apply across all Medi-Cal delivery systems, including Medi-Cal

Rx, fee-for-service claims, and Medi-Cal managed care encounter reporting. Given the significant provider participation and numerous implementation questions raised during the meeting, DHCS acknowledged that additional stakeholder engagement will be necessary. The Department indicated it will post the meeting recording, presentation materials, and updated Frequently Asked Questions, conduct focused stakeholder sessions during August, and convene a second statewide Town Hall in late September after incorporating stakeholder feedback into its implementation plan.

During the meeting, DHCS emphasized that the federal Medicaid regulations require all Ordering, Referring, and Prescribing (ORP) providers to be individually enrolled in Medi-Cal and possess a **Type 1 National Provider Identifier (NPI)**. According to DHCS, implementation is intended to strengthen program integrity, reduce fraud and improper payments, protect federal and state funding, improve accountability, and ensure that services are ordered and provided by appropriately qualified practitioners acting within their scope of practice. DHCS also acknowledged that implementation may create operational challenges, including claim denials when ORP information is missing or invalid, delays in patient access to care, and the possibility that some practitioners may decline Medi-Cal enrollment because of the additional administrative burden. To mitigate these impacts, DHCS is encouraging proactive outreach by health care facilities, physician organizations, pharmacies, and billing providers to identify practitioners who prescribe or order services for Medi-Cal beneficiaries but have not yet completed Medi-Cal enrollment.

For APG members operating under delegated managed care arrangements, several implementation issues warrant additional discussion with DHCS. The Department's presentation focused primarily on provider enrollment and claims processing, but many operational questions remain regarding delegated physician organizations, contracted specialists practicing under letters of agreement, hospital-based practitioners, locum tenens coverage, and other providers who may participate in patient care without maintaining direct Medi-Cal enrollment. APG also believes additional clarification is needed regarding implementation timelines, provider outreach responsibilities, the treatment of denied or suspended claims during the transition period, and how managed care organizations and their delegates will be expected to operationalize these new requirements while minimizing disruption to patient care.

APG is developing a policy letter to DHCS addressing these implementation issues and requesting additional operational guidance before enforcement begins. Members are encouraged to share examples of potential implementation challenges, questions regarding specific provider arrangements, or recommendations that would improve implementation while preserving timely access to care. Please send comments to wbarcellona@apg.org so they can be incorporated into APG's discussions with DHCS and our forthcoming policy letter.



DHCS Schedules CY 2025 MLR Meeting for August 27: Register Today!

Important Notice:

DHCS will host an MLR stakeholder meeting

August 27 at 10:30 am.

Click [here](#) to join the meeting.

Meeting ID: 241 172 488 972 728

Passcode: bR38Gq7b



Register For The August 11 California Med-Cal Forum

APG California Medi-Cal Forum

Tuesday, August 11

[Register](#)

Our upcoming **California Medi-Cal Forum** will focus on several important Medi-Cal policy and operational issues where APG is seeking member input to help shape our advocacy with DHCS, health plans, and other state policymakers.

Our primary discussion topics will include:

- **2026 Medi-Cal MLR Reporting Debrief.** We'll conduct a member discussion on this year's Medical Loss Ratio (MLR) reporting process, including what worked well, operational challenges encountered, lessons learned, and opportunities for future improvements. Member feedback will help inform APG's continuing discussions with Medi-Cal managed care plans and the Department of Health Care Services.
- **APG Fraud, Waste & Abuse Workgroup Charter.** We'll discuss the formation of this workgroup and outline the priorities and structure of this effort. This discussion will help APG better articulate the value of the delegated model in future policy discussions with state regulators.
- **Added: Update on DHCS Ordering, Referring & Prescribing Town Hall Mtg.** DHCS has invited stakeholders to submit another round

of comments on their ORP implementation policy during August.
Please provide us with your input during this meeting topic.

These sessions are intended to be **member input discussions**. As always, APG's advocacy begins with the operational experience of physician organizations. By identifying common challenges across our membership, we develop practical policy recommendations that strengthen California's Medi-Cal delivery system.

We look forward to your participation and to hearing your perspectives.



2026 APG California Policy & Advocacy Meeting Dates

Members, please mark your calendars for APG's California Policy Forum and California Medi-Cal Forum meetings. You can download APG's 2026 events calendar [here](#).

California Policy Forum

2:00 - 3:00 pm

- December 3

California Medi- Cal Forum

4:00 - 5:00 pm

- August 11 - [Register](#)
- October 13
- November 10
- December 8



APG California Advocacy Member Resources

- [2025 Legislative Implementation Guide](#)
- **Tracked Health Care Bills [2025-26](#)**: bills we're following in the California State Legislature

For more news and resources, please visit APG's [website](#) or contact a member of APG's California advocacy team.

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