CALIFORNIA UPDATE

November 17, 2026

Join Tomorrow's OHCA Board Meeting And Support Fair Spending Accountability

Wednesday, November 18, 2026
Meeting begins at 10:00 a.m. Pacific

APG urges California members to participate in tomorrow's Health Care Affordability Board meeting and offer public comment during **Item 4(a), Overview of Progressive Enforcement Regulations, Including Board Follow Up and Public Comment.** The agenda identifies this as an informational discussion rather than a scheduled adoption vote.

Access the meeting page and virtual login
Select **"Online"** on the OHCA meeting page to join. The page also provides the agenda and presentation materials. Public comments are generally limited to two minutes.

OHCA Recognizes Delegated Risk but Leaves Attribution Concerns Unresolved

Following APG's October 30 comment letter and input from physician organizations, OHCA staff has added the "extent of delegated clinical and financial risk" to its regulatory enforcement considerations. Staff also plans physician-organization stakeholder discussions and possible workgroup meetings in 2027.

These steps acknowledge the differences among delegated arrangements. However, staff has not committed to mandatory review of an organization's division of financial responsibility, or DOFR, before enforcement. Broader changes to the total medical expenditure attribution methodology remain subjects for future consideration.
The practical concern persists: physician organizations may be attributed spending controlled by another entity and may lack the underlying data needed to explain or dispute OHCA's findings. An organization cannot prepare a fair response—or a credible performance improvement plan addressing spending outside its control—without knowing how those expenditures were attributed.

APG's Request for Tomorrow
David Gonzalez, APG's Senior Legislative Advocate, will present comments in person. We encourage members to reinforce one clear request:

OHCA must provide all underlying expenditure and attribution data at the same time a physician organization receives notice that it has exceeded the spending target. The full 45-day response period should begin only when both the notice and complete supporting data have been provided.

Members can explain why access to those data is essential to checking attribution, reviewing contractual responsibilities, and preparing an informed response. Our central principle remains: **Providers should be responsible for that which they control.**

Please review these materials before the meeting:

- **Download APG's member memorandum** summarizing staff's responses and recommended public comment.
- **Download the two OHCA presentation slides** addressing physician-organization spending measurement.
- **Review the meeting agenda** and plan to comment during Item 4(a).

Your participation will help the Board understand why timely access to the supporting data is fundamental to a fair and equitable enforcement process.

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

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