CALIFORNIA UPDATE

November 20, 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:

- **Moving The Needle On The OHCA Enforcement Regulations**
- **The Provider's Stake in AB 280: Insights from APG and Symphony**
- **California Policy Forum: December 3**
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Moving The Needle On The OHCA Enforcement Regulations

At its November 18 meeting, the Health Care Affordability Board heard how the Office of Health Care Affordability (OHCA) plans to revise its draft spending-target enforcement regulations following public comment. Staff recognized that physician organizations assume different levels of clinical and financial risk under their contracts. How OHCA attributes spending to those organizations remains an open issue.

Thank you to the APG members who testified Wednesday. Dr. Mike Conroy of Sutter, Sabra Matovsky of Health Care L.A. IPA, and Dr. Jim Wood of Heritage Provider Network spoke during public comment. APG Senior Legislative Advocate David Gonzalez testifed to hold physician organizations accountable for spending they can control, require review of the applicable Division of Financial Responsibility (DOFR) and delegation agreements before requiring a performance improvement plan or imposing a penalty, and resolve material attribution disputes before corrective action.

What OHCA staff proposed

Consider delegated risk in enforcement. Staff added the extent of delegated clinical and financial risk as an enforcement consideration. Physician organizations could submit information about their delegated arrangements during the 45-day response period. APG continues to seek mandatory review of the applicable agreements before enforcement.

Revisit how spending is attributed. Staff will explore changes to the physician organization spending methodology and consider alternative data sources. OHCA plans to meet with physician organization

stakeholders and convene workgroup meetings as needed in 2027. Any methodology changes OHCA adopts would go through future rulemaking.

Slides 24–25 address physician organization spending measurement. For the broader staff response, including performance improvement plans, penalties, and transparency, see slides 24–41 of the November 18 Board presentation.

Join the December 16 meeting and offer public comment
Wednesday, December 16, at 10:00 a.m. Pacific. The meeting is listed for online participation. The direct logon link and dial-in details are pending. Check the December 16 Board meeting page for the agenda and online access.

APG urges members to log on and offer public comment. Bring a concrete example of spending attributed to your organization when another entity set the price, contracted for the service, or held financial responsibility. Ask the Board to require OHCA to provide all underlying attribution data **with any notice that an organization exceeded its spending target**, so the organization can use the full 45-day response period to verify the data and respond. Written public comments can be sent to ohca@hcai.ca.gov.

California Policy Forum: December 3
Please join us **Thursday, December 3** at **2:00 pm Pacific** for a Zoom briefing on the outcome of the 2026 Legislative and Regulatory Session. We will cover newly enacted legislation and pending regulations, including APG implementation guides. We have included a summary of the session here for your reference before the meeting.

Register here

The Provider's Stake in AB 280: Insights from APG and Symphony
Tuesday, December 15, 2026
12:00 - 1:00 pm PT
Register

California is at an inflection point for provider directory data accuracy. AB 280, passed this fall, requires the Department of Managed Healthcare (DMHC) to select a central utility for directory data maintenance in California. While most of the bill's direct obligations fall on health plans, AB 280 stipulates that these plans require their contracted provider

organizations to participate in the same central utility – meaning providers have a stake in the state's selection.
The Symphony Provider Directory will join America's Physician Groups (APG) in a webinar to discuss:

- Why provider organizations should care about AB 280
- Why APG endorses Symphony as AB 280's central utility
- Symphony features making data submission easier for providers today

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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 - ***Register***

California Medi- Cal Forum
4:00 - 5:00 pm

- December 8 - ***Register***

APG California Advocacy Member Resources

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

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

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