



**Office of Health Care Affordability**  
Department of Health Care Access and Information

# Health Care Affordability Board Meeting

January 28, 2026





**Office of Health Care Affordability**  
Department of Health Care Access and Information

# Welcome, Call to Order, and Roll Call



# Agenda

Item #1 **Welcome, Call to Order, and Roll Call**  
*Secretary Kim Johnson, Chair*

Item #2 **Executive Updates**  
*Elizabeth Landsberg, Director; Vishaal Pegany, Deputy Director*

Item #3 **Action Consent Item**  
Vote to Approve December 16, 2025 Meeting Minutes  
*Vishaal Pegany*

Item #4 **Action Item**  
Vote to Appoint Advisory Committee Member  
*Megan Brubaker, Engagement and Governance Group Manager*

Item #5 **Informational Items**

- a) Cost-Reducing Strategies – Los Angeles General Medical Center Safer@Home Program  
*Margareta Brandt, Assistant Deputy Director; Dr. Brad Spellberg, Chief Medical Officer; Dr. Josh Banerjee, Associate Medical Director of Transitions of Care; Dr. Christopher Lynch, Medical Director, Safer@Home Program*
- b) Hospital Sector Target Adjustments Methodology – Considering Resubmissions of Hospital Data  
*Vishaal Pegany; CJ Howard, Assistant Deputy Director*
- c) Update on Total Health Care Expenditures Data Submission Regulations (DSG 3.0)  
*Vishaal Pegany*
- d) Exploring Drivers of Health Care Spending Across Commercial Payers  
*Andrew Feher, Research and Analysis Group Manager*
- e) Spending Target Enforcement – Performance Improvement Plan Follow-up  
*Vishaal Pegany; CJ Howard*

Item #6 **General Public Comment**

Item #7 **Adjournment**



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# Executive Updates

Elizabeth Landsberg, Director  
Vishaal Pegany, Deputy Director



# Rural Health Transformation Program

## Recap to-date

- Grant Application Submitted November 4<sup>th</sup>
- Proposal focused on three key initiatives:
  - Transformative Care Model
  - Workforce Development
  - Technology & Tools
- The Centers for Medicare and Medicaid Services (CMS) announced awards on December 29<sup>th</sup>
  - California received an intent to award \$233,639,308 for the first year

## Next Steps

- HCIA will revise the grant budget to account for the increased funds
- Revisions due to CMS by Jan. 30
- CMS will review and approve the use of funds within 45 days of HCIA submission
- HCIA will share additional information as it becomes available through our stakeholder mailing list and website
- Contact us at the new Rural Health Transformation address: [CalRHT@hcia.ca.gov](mailto:CalRHT@hcia.ca.gov)

# Quarterly Work Plan\*

	Total Health Care Expenditures & Spending Targets			Cost and Market Impact Review (CMIR)	Promoting High Value
JAN	Board	<ul style="list-style-type: none"> <li>Update on Total Health Care Expenditures Data Submission Regulations (DSG 3.0)</li> <li>Exploring Drivers of Health Care Spending Across Commercial Payers</li> <li>Spending Target Enforcement – Performance Improvement Plan Follow-up</li> <li>Hospital Sector Target Adjustments Methodology – Considering Resubmissions of Hospital Data</li> </ul>			<ul style="list-style-type: none"> <li>Cost-Reducing Strategy – Los Angeles General Medical Center's Safer@Home Program</li> </ul>
	AC	<ul style="list-style-type: none"> <li>Update on Behavioral Health Out-of-Plan Spending</li> <li>Introduction to Total Health Care Expenditures Data Submission Regulations (DSG 3.0)</li> <li>Spending Target Enforcement – Technical Assistance, Public Testimony, Waiver of Enforcement, and Performance Improvement Plans</li> </ul>	<ul style="list-style-type: none"> <li>CMIR Update</li> </ul>	<ul style="list-style-type: none"> <li>Introduction to HCAI Health of Primary Care in California Snapshot</li> </ul>	
FEB	Board	<b>No Meeting</b>			
	AC	<b>No Meeting</b>			
MAR	Board	<ul style="list-style-type: none"> <li>Spending Target Enforcement -- Performance Improvement Plans</li> <li>Spending Target Data Submission Enforcement – Introducing Regulatory Text</li> <li>Total Health Care Expenditures Data Submission Regulations (DSG 3.0) – Discussing Comments on Regulatory Text</li> </ul>	<ul style="list-style-type: none"> <li>CMIR Update</li> <li>CMIR Regulations – Introducing Regulatory Text</li> </ul>		
	AC	<b>No Meeting</b>			
APR	Board	<ul style="list-style-type: none"> <li>Spending Target Penalties</li> <li>Spending Target Data Submission Enforcement – Discussing Comments on Regulatory Text</li> <li>Hospital Measurement Update</li> <li>Total Health Care Expenditures Data Submission Regulations (DSG 3.0) – Status Update for Regulatory Text</li> </ul>	<ul style="list-style-type: none"> <li>CMIR Regulations – Discussing Comments on Regulatory Text</li> </ul>		
	AC	<ul style="list-style-type: none"> <li>Spending Target Enforcement -- Performance Improvement Plans</li> <li>Spending Target Penalties</li> <li>Hospital Measurement Update</li> </ul>	<ul style="list-style-type: none"> <li>CMIR Regulations – Discussing Regulatory Text</li> </ul>		

\* Work plan is subject to change.

# Future Topics Beyond April 2026\*

## THCE & Spending Target

- Spending Target Data Submission Enforcement – Status Update for Regulatory Text
- Spending Target Enforcement – Penalties, Board Vote, Regulations
- Interim Report on Health Care Spending

## Promoting High Value

- Behavioral Health Investment Benchmark
- HCAI Primary Care Snapshot Updates
- Introduce Equity and Quality Adjustment

## Assessing Market Consolidation

- Update on Material Change Notices Received, Transactions Receiving Waiver or Warranting a CMIR, and Timing of Reviews for Notices and CMIRs
- CMIR Regulations – Status Update for Regulatory Text

\* Subject to change.

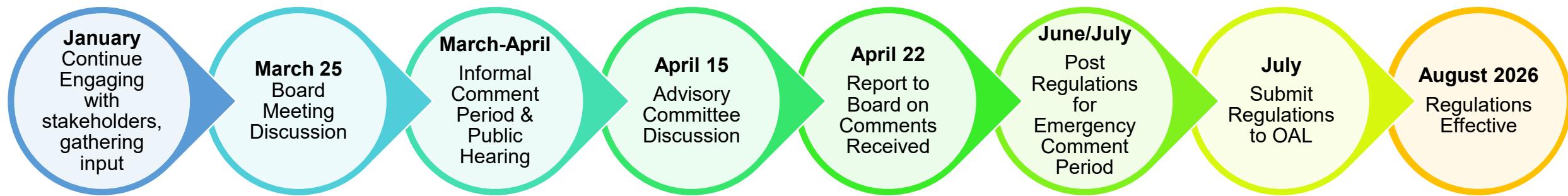
# 2026 Reporting Roadmap\*

	<b>Total Health Care Expenditures &amp; Spending Targets</b>	<b>Promoting High Value</b>
Q1	<ul style="list-style-type: none"><li>Cost Driver Issue Brief #1: Population aging, utilization, and chronic condition prevalence</li></ul>	<ul style="list-style-type: none"><li>HCAI Primary Care Snapshot Brief</li></ul>
Q2	<ul style="list-style-type: none"><li>OHCA Facility-level National Provider Identifier (NPI) Crosswalk</li><li>OHCA Facility-level Inpatient and Outpatient Spending Dataset</li><li>Interim Health Care Spending Report</li><li>Cost Driver Issue Brief #2: Intensity of services</li></ul>	<ul style="list-style-type: none"><li>HPD Behavioral Health Spending Analysis</li></ul>
Q3		<ul style="list-style-type: none"><li>Health System Performance Baseline Report</li><li>HCAI Primary Care Snapshot (static version)</li><li>HPD Behavioral Health Spending Analysis</li></ul>
Q4	<ul style="list-style-type: none"><li>Cost Driver Issue Brief #3: Regional price variation in shoppable services</li></ul>	

\* Subject to change.

Note: Cost Driver Issue Briefs #2 and #3 may publish in either Q2 or Q4 of 2026.

# Projected Timeline for Revising CMIR Regulations Due to AB 1415



# National Health Expenditures (NHE) 2024

## Growth Rates

- Health care spending reached \$5.3 trillion in 2024, averaging \$15,474 per person. The per capita growth rate was 6.1%, down from 6.5% in 2023.
- Among the major coverage sources, Medicaid spending per enrollee grew fastest at 16.6% (\$11,050 per enrollee), up from 6.5% in 2023. The authors attribute this accelerated spending growth to changes in enrollment composition and rising provider payment rates.
- Medicare spending per enrollee grew 5.4% (\$16,779 per enrollee), down from 6.7% in 2023.
- Private health insurance spending per enrollee grew 5.2% (\$7,676 per enrollee), down from 9.6% in 2023. Private health insurers' nonmedical spending grew 4.4%, down from 10.5% in 2023.

# National Health Expenditures (NHE) 2024

## Growth Drivers

- The insured population decreased from an all-time high of 92.5% in 2023 down to 91.8% in 2024.
- Similar to 2023, the authors note that spending growth was driven primarily by nonprice factors such as the use and intensity of services, particularly for hospital care, physician and clinical services and retail prescription drugs.
- In 2024, medical price growth contributed 2.5 percentage points, while use and intensity accounted for a larger share at 3.6 percentage points of the 6.1% per capita increase.
- Three Largest Spending Categories:
  - **Hospital Care** (31% of total spending) increased 8.9%, down from 10.6% in 2023. Growth was highest for private health insurance (10.4%), followed by Medicaid (8.5%) and Medicare (6.9%). Growth in prices for hospital care was 3.4%, up from 2.7% in 2023 and the highest rate of increase since 2007.
  - **Physician and Clinical Services** (21% of total spending) increased 8.1%, up from 7.4% in 2023. Prices for this category rose by 1.8% compared with a .6% increase in 2023.
  - **Prescription Drugs** (9% of total spending) increased 7.9%, down from 10.8% in 2023. Prices for prescription drugs grew slower at 1.4% compared to 2.3% in 2023.

# OHCA January 2026 Publications

- Earlier this month, OHCA emailed hospitals and posted on its website a preliminary [facility-level crosswalk](#) to support implementation of its hospital spending workstream.
- In addition, OHCA posted its first cost driver [issue brief](#) using HPD data to build upon findings from its baseline report.

## 2026 OHCA Data

- [Facility Number NPI Crosswalk FY 22-23](#)

## Issue Briefs

### 2026

- [Exploring Drivers of California Healthcare Spending Across Commercial Payers](#)

# Patient and Consumer Forum on Health Care Affordability

OHCA is establishing a patient and consumer forum that would convene 2 to 4 times per year. The goals of this forum are:

- To actively engage patients, consumers, and advocacy groups in our work.
- To listen and understand their concerns and lived experiences.
- To inform these groups on the work of OHCA and the Board.

Inaugural Session: March 10, 2026, from 1:00-5:00 PM

- Date and time are tentative and will be confirmed.
- Meeting will be held in person, as well as virtually, to ensure accessibility.

# Slide Formatting



Indicates informational items for the Board and decision items for OHCA



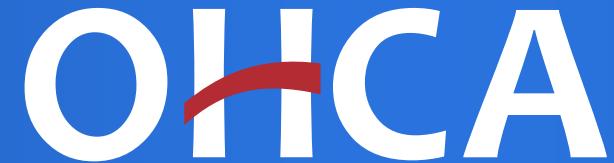
Indicates current or future action items for the Board



**Office of Health Care Affordability**  
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# Public Comment





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# Action Consent Item: Vote to Approve December 16, 2025 Meeting Minutes





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# Public Comment





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# Cost-Reducing Strategies: Los Angeles General Medical Center Safer@Home Program

Margareta Brandt, Assistant Deputy Director

Dr. Brad Spellberg, Chief Medical Officer

Dr. Josh Banerjee, Associate Medical Director of Transitions of Care

Dr. Christopher Lynch, Medical Director, Safer@Home Program



## **An All-Virtual Acute, Home Care Model**

**Christopher Lynch, MD**- Medical Director  
of Safer@Home

**Josh Banerjee, MD**- Associate Medical  
Director of Transitions of Care

**Brad Spellberg, MD** - Chief Medical Officer



# SAFER @OME OVERVIEW



- **Virtual care, at home, for patients who would otherwise be in the hospital**
- **Patients monitored via remote pulse oximetry and thermometer**
- **Daily phone visit check-ins with video support**
- **All medications oral or inhaled in lieu of IV**
- **First implemented during COVID to enable home care for COVID pneumonia requiring oxygen**

Los Angeles General  
Medical Center



Ultimately, we cared for >4,000 patients with COVID pneumonia at home during the pandemic



If not for Safer@Home, LA General would have reached the triage stage during winter of '20-'21



Post COVID, LA General decided to expand the program to other common, acute illnesses





Historically “IV antibiotics” or “IV medications” has been a valid reason to admit people to hospital



Similarly, new onset pneumonia severe enough to require oxygen



But modern clinical trials have demonstrated that IV therapy is not more effective than oral



And we found that oxygen up to 6 liters/hour could be safely given at home during COVID



# WHY SAFER HOME

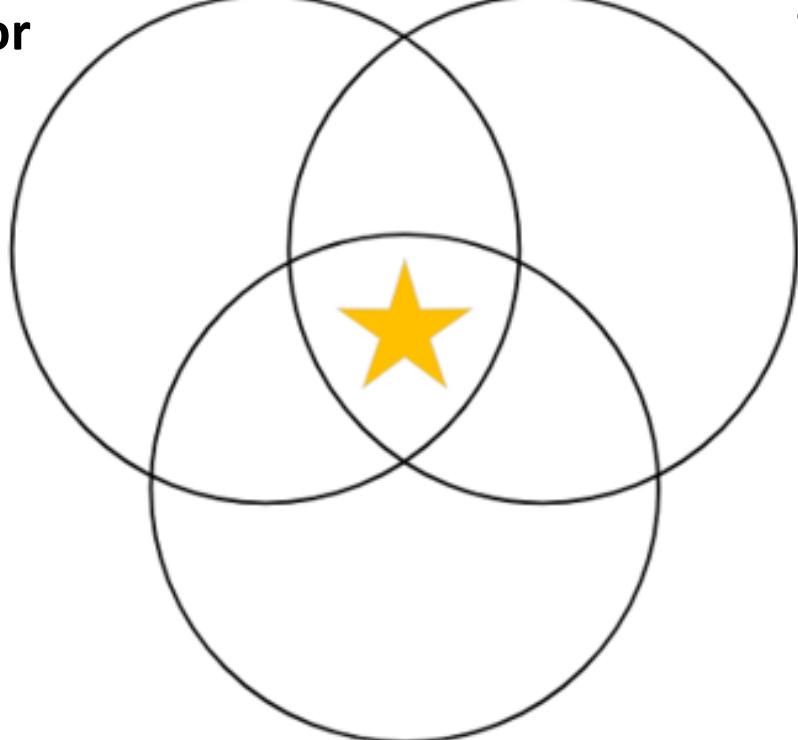


-  Hospitalizations can cause harm events and can be disruptive to patients' lives.
-  Access to care is critical and hospital overcrowding can compromise quality of care.
-  Recent innovations in care practices suggest we do not need to hospitalize patients for as many indications as previously thought.
-  We should care for as many patients at home whenever it is safe to do.
-  “Hospital at Home” models are not feasible due to expansive patient catchment area in LA County and limited staffing.
-  LA General’s community partners expressed a strong desire to expand patient-centered, out-of-hospital care



# Population and Key Principles for Enrollment

**Patient Requires  
Admission or  
Continued  
Enrollment**



**Low Probability of Rapid Decompensation**

**High Probability of  
Treatment  
Response**



**Los Angeles General  
Medical Center**

# SAFER @ HOME OVERVIEW



## Current eligible diagnoses:

- Acute gallstones
- Alcohol withdrawal
- Asthma/COPD exacerbation
- Bone infections
- Cellulitis (skin infection)
- Complicated Urinary/Kidney Infections
- Diabetic foot infections
- Heart failure exacerbations
- Multiple sclerosis exacerbations
- Pneumonia (viral or bacterial)
- Other as needed

# Safer@Home Process

1

**Care team calls the on-call Safer@Home Attending (12 hours per day coverage)**

2

**Reviews criteria for the program**

3

**If accepted, teaching and DME provided to the patient by Discharge Lounge nursing**

4

**Daily video visits with nurse using disease-specific script, with hospitalist back up**

5

**If face-to-face eval needed, Med Uber transportation provided to Urgent Care**

## Strategies to Address Barriers to Implementation

- Provider Adoption
  - Departmental, Chiefs/Chairs, and Resident Grand Rounds Presentations
  - ED Physician and Nurse Champions (part of S@H Leadership Team)
  - ED and Medical Unit Huddles
  - S@H Attending on-call 7a-7p
  - Job aids for residents and fellows
- Evolution of strategies based on provider feedback
  - Make enrollment process more efficient
  - Need for 24/7 (overnight) process for ED providers
  - Need for antibiotic decision support
  - Creation of more standardized pathways (e.g., Heart Failure Exacerbation)
  - Easy access to most current and more detailed program information

# Enrollment Order Sets with Antibiotic Decision Support

Component	Status	Dose ...	Details
<b>Safer at Home - Diabetic Foot Infection (Planned Pending)</b>			
 <b>Safer at Home - Infected Diabetic Foot Ulcer</b> (For questions, please contact Safer at Home Attending listed on Amion)			
 <b>Referral Information:</b>			
<input checked="" type="checkbox"/>  <b>Enroll into Safer at Home</b>			T;N, DM Foot Ulcer Infection (cellulitis, OM)
<input checked="" type="checkbox"/>  <b>Communication Order (DO NOT USE FOR MEDICATIONS)</b>			T;N >> If patient is currently in the ED or ED OBS, patient must be discharged AND transported to ED OBS. Discuss and coordinate with...
 <b>DME Orders (All patients enrolled into Safer at Home to receive pulse oximeter and thermometer. Order additional DME as needed):</b>			
<input checked="" type="checkbox"/>  <b>DME Respiratory Oximetry Device</b>			Device for Home use, Not applicable for this Order, T;N, Safer at Home
<input checked="" type="checkbox"/>  <b>DME Miscellaneous Equipment</b>			T;N, Safer at Home: DME Thermometer
<input checked="" type="checkbox"/>  <b>DME Phone for Safer at Home</b>			T;N, Safer at Home
 <b>Prescriptions:</b>			
 <b>RECOMMENDED EMPIRIC ORAL ANTIBIOTIC (for patients &gt;18 years old)</b>			
<ul style="list-style-type: none"> <li>· If susceptibilities available, used targeted therapy (in consultation with ID if necessary).</li> <li>· Duration of therapy:           <ul style="list-style-type: none"> <li>- 5-6 days if exam is consistent with cellulitis.</li> <li>- 4 weeks if concern for osteomyelitis but further workup needed (i.e. MRI as outpatient; antibiotic treatment can be extended in outpatient setting if needed).</li> <li>- 6 weeks if findings consistent with osteomyelitis (i.e. XR findings consistent or able to probe to bone).</li> </ul> </li> <li>· If renal dysfunction present, adjust dose and discuss with pharmacy as needed.</li> </ul>			
<ul style="list-style-type: none"> <li>&gt;&gt; If no abscess present, the patient has not previously grown MRSA or Pseudomonas from prior cultures, and the wound is not gangrenous:           <ul style="list-style-type: none"> <li>· Amoxicillin-clavulanic acid 875mg BID. If renal dysfunction, discuss with pharmacy regarding renal dosing.</li> </ul> </li> </ul>			
<ul style="list-style-type: none"> <li>&gt;&gt; If an abscess is present (even if drained), or the patient has previously grown MRSA:           <ul style="list-style-type: none"> <li>· TMP-SMX 2 DS BID + metronidazole 500 mg BID (when using TMP-SMX, be mindful of need for renal dose adjustment. If renal dysfunction, consider alternative medication or discuss with pharmacy regarding renal dosing).</li> <li>· Clindamycin 600mg TID - be aware of GI side effects and compliance.</li> <li>· Doxycycline 100 mg BID + metronidazole 500 mg BID.</li> </ul> </li> </ul>			
<ul style="list-style-type: none"> <li>&gt;&gt; If the patient has previously grown Pseudomonas (not resistant to ciprofloxacin/levofloxacin) or the wound is gangrenous:           <ul style="list-style-type: none"> <li>· Levofloxacin 750 mg daily + metronidazole 500 bid mg once daily. If renal dysfunction, discuss with pharmacy regarding renal dosing for levofloxacin.</li> </ul> </li> </ul>			
<input type="checkbox"/>  amoxicillin-clavulanate (amoxicillin-clavulanate 875 ...)			1 tabs, Oral, Q12H, # 56 tabs, Safer at Home Patient Dosing per ID recommendations.
<input type="checkbox"/>  sulfamethoxazole-trimethoprim (sulfamethoxazole-tri...)			2 tabs, Oral, BID, # 112 tabs, Safer at Home Patient Dosing per ID recommendations.
<input type="checkbox"/>  metroNIDAZOLE (metroNIDAZOLE 500 mg oral tablet)			2 tabs, Oral, Q24H, # 28 tabs, Safer at Home Patient Dosing per ID recommendations.
<input type="checkbox"/>  clindamycin (clindamycin 300 mg oral capsule)			2 caps, Oral, Q8H, # 168 caps, Safer at Home Patient Dosing per ID recommendations.
<input type="checkbox"/>  doxycycline (doxycycline monohydrate 100 mg oral c...			= 1 caps, Oral, BID, # 56 caps, Safer at Home Patient Dosing per ID recommendations.
<input type="checkbox"/>  levoFLOXacin (levoFLOXacin 750 mg oral tablet)			1 tabs, Oral, Q24H, # 28 tabs, Safer at Home Patient Dosing per ID recommendations.

# Staff Facing Website



Safer@Home

Home

+ New Page details Preview Analytics

What is Safer@Home?

Inpatient Referring Provid...

ED/OBS Referring Provid...

Nursing (Primary RNs)

Referral Criteria

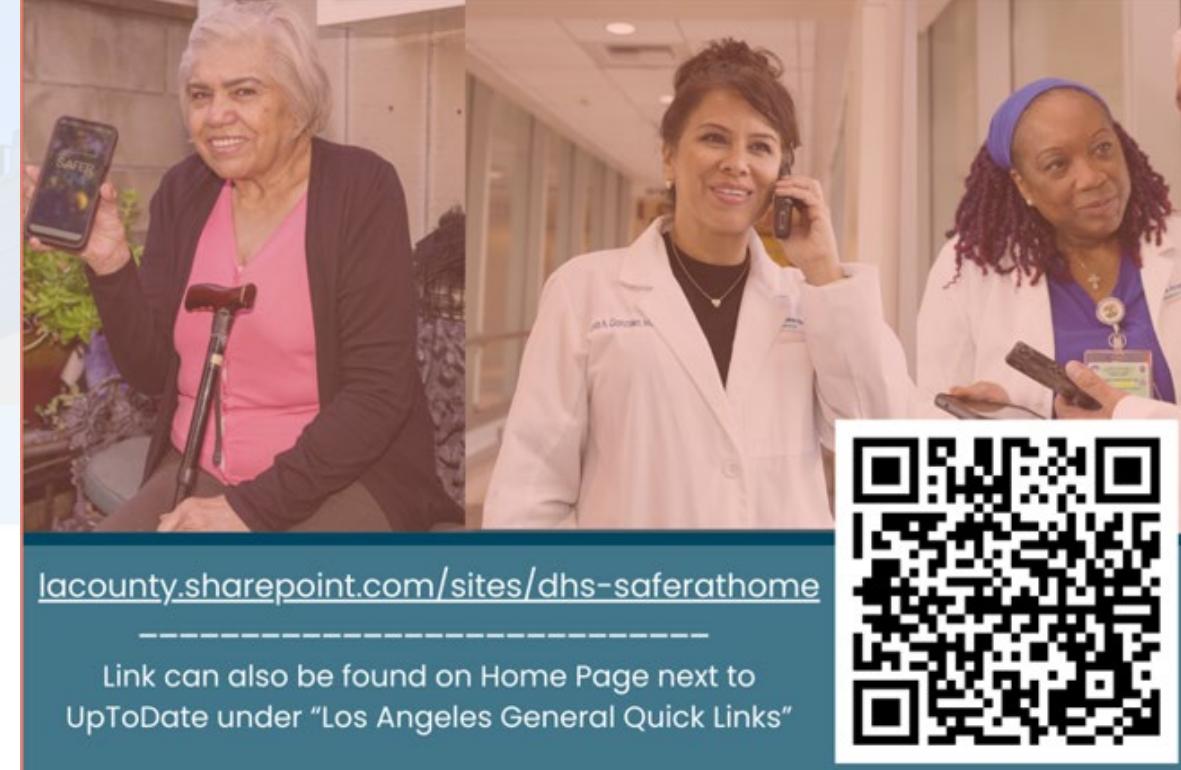
Home Monitoring Equip...

Site contents

Recycle bin

Edit

Click the applicable tiles below for more information.



## Patient Barriers



There is a digital divide in our patient population that makes it difficult for them to fully take advantage of the S@H program. Lack of access to reliable technology perpetuates further disparity in healthcare.

## Improve Access Via



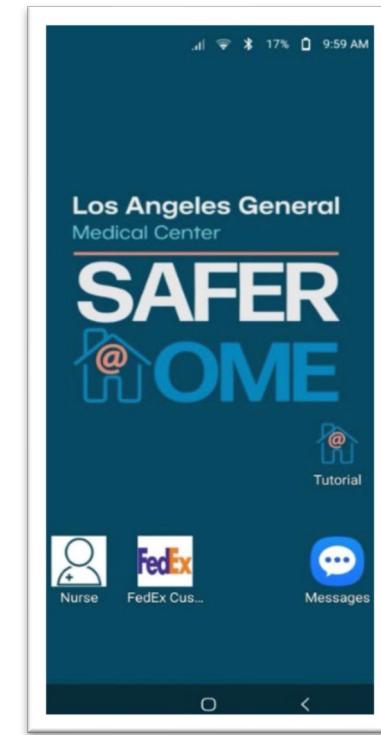
**Voice**



**Messaging**



**Video**



# RESULTS

## Year 1 of the Program

Patient Characteristic	Safer At Home Cohort	Comparison Cohort	P Value
Total	876	1590	
Care Setting at Discharge--no. (%)			
Hospital (Inpatient)	396 (45.2%)	1590 (100%)	
Emergency Department / Observation / Urgent Care (Outpatient)	480 (54.8%)	0 (0%)	
Patient Age--avg. (SD)	54.0 (14.5)	52.3 (19.6)	0.15
Patient Sex			0.14
Female	335 (38.2%)	688 (43.3%)	
Male	541 (61.8%)	901 (56.7%)	
Patient Race/Ethnicity--no. (%)			0.071
White	10 (2.6%)	59 (3.7%)	
Hispanic	326 (83.2%)	1235 (77.7%)	
Black	14 (3.6%)	108 (6.8%)	
Asian	19 (4.9%)	75 (4.7%)	
Other	26 (6.6%)	113 (7.1%)	
Patient Case Mix Index--avg.(SD)	1.27 (0.66)	1.26 (0.59)	0.72
Patient Expected Mortality--avg.(SD)	0.016 (0.47)	0.019 (0.059)	0.45

# RESULTS

## Year 1 of the Program

Patient Outcome	Safer At Home Cohort	Comparison Cohort	P- Value
Hospital Length of Stay Days avg.(SD)	1.33 (2.00)	5.34 (10.44)	<0.0001
Number of 30-Day Urgent Care Visit Per Patient--avg. (SD)*	0.61 (0.96)	0.083 (0.51)	<0.0001
Number of 30-Day Emergency Department Visit Per Patient--avg. (SD)*	0.19 (0.50)	0.21 (0.85)	<0.0001
30-Day Hospital Readmission--no. (%)	174 (19.9%)	266 (16.9%)	0.062
30-Day Mortality--no. (%)	4 (0.5%)	16 (1.0%)	0.13

## RESULTS

- In year 1, **876** patients enrolled = 2.3 pts/day
- In year 2, **1,171** patients enrolled = 3.2 pts/day
- In year 3, **1,230** patients in 11.5 mos = 3.5 pts/day
- Year 1 detailed financial analysis would generate an additional 50% of savings with higher enrollment now achieved

# Safer@Home Analysis

## Year 1 Financial Analysis

- **LA General has a very high rate of Medicaid/uninsured**
- **\$4 million revenue lost; mostly Medicare/Commercial**
- **\$10 million costs avoided; mostly Medicaid; \$0.7 million in fixed costs**
- **Net \$5.6 million saved; Net savings for Medicaid/uninsured  
Net losses for Medicare/Commercial**

Table 1. Net Hospital Financial Outcomes: Cost Avoidance vs. Lost Revenue and Fixed Costs

Total Inpatient Days Saved Insurance (N, %)	Total Inpatient Days Saved	Total Lost Revenue	Total Variable Costs Avoided	Total Fixed Costs of the Program*	Net Revenue Lost + Cost Saved	Net Revenue/Cost Per Case
Base Case Analysis						
Medicare: 121 (13.8%)		-\$1,876,585	\$1,469,533	-\$94,279	-\$501,331	-\$4,143
Medicaid: 676 (77.2%)		-\$1,670,311	\$7,861,619	-\$526,714	\$5,664,594	\$8,380
Commercial: 11 (1.3%)		-\$444,152	\$166,734	-\$8,571	-\$285,989	-\$25,999
Tricare/VA: 3 (0.3%)		-\$34,256	\$48,040	-\$2,337	\$11,447	\$3,816
Uninsured: 65 (7.4%)		-	\$761,348	-\$50,646	\$710,702	\$10,934
<b>Total</b>	<b>-3504</b>	<b>-\$4,025,305</b>	<b>\$10,307,274</b>	<b>-\$682,547</b>	<b>\$5,599,422</b>	<b>\$6,392</b>

**Reimbursement at around 55–65% of normal DRG payment would be cost neutral to society/payors, while enabling cost savings at hospitals with normal payor mixes**

# Questions?





Thank You

Los Angeles General  
Medical Center



**Office of Health Care Affordability**  
Department of Health Care Access and Information

# Public Comment





# Action Item: Vote to Appoint Advisory Committee Member

Megan Brubaker, Engagement and Governance Group Manager



# Special Payer Recruitment Process

- October 29, 2025 – November 30, 2025, 13 submissions received.
- New AC Subcommittee appointed at the November Board meeting.
- Subcommittee met in December to discuss submissions and recommend a Payer for appointment.

# Advisory Committee Members – 28

Payers	Medical Groups	Purchasers	Consumer Representatives & Advocates	Organized Labor
<b>Kassie Maroney</b> Senior Vice President, Underwriting and Analytics, Chief Actuary, Blue Shield of California	<b>Hector Flores</b> Medical Director, Family Care Specialists Medical Group	<b>Ken Stuart</b> Chairman, California Health Care Coalition	<b>Carolyn Nava</b> Senior Systems Change Advocate, Disability Action Center	<b>Joan Allen</b> Government Relations Advocate, SEIU United Healthcare Workers West
<b>Manan Shah</b> VP & General Manager, Commercial Business, Elevance Health / Anthem Blue Cross of California	<b>Stacey Hrountas</b> Chief Executive Officer, Sharp Rees-Stealy Medical Centers	<b>Suzanne Usaj</b> Senior Principal, Health and Benefits, Mercer	<b>Mike Odeh</b> Senior Director of Health, Children Now	<b>Carmen Comsti</b> Lead Regulatory Policy Specialist, California Nurses Association/National Nurses United
<b>Andrew See</b> Senior Vice President, Chief Actuary, Kaiser Foundation Health Plan	<b>David Joyner</b> Chief Executive Officer, Hill Physicians Medical Group	<b>Iftikhar Hussain</b> Chief Financial Officer, San Francisco Health Service System	<b>Kiran Savage-Sangwan</b> Executive Director, California Pan-Ethnic Health Network (CPEHN)	<b>Janice O'Malley</b> Legislative Advocate, American Federation of State, County and Municipal Employees
<b>Hospitals</b>	<b>Physicians</b>	<b>Health Care Workers</b>		<b>Kati Bassler</b> President, California Federation of Teachers, Salinas Valley
<b>Barry Arbuckle</b> President & Chief Executive Officer, MemorialCare Health System	<b>Adam Dougherty</b> Emergency Physician, Vituity	<b>Stephanie Cline</b> Respiratory Therapist, Kaiser	<b>Marielle A. Reataza</b> Executive Director, National Asian Pacific American Families Against Substance Abuse (NAPAFASA)	<b>Academics/Researchers</b>
<b>Tam Ma</b> Associate Vice President, Health Policy and Regulatory Affairs, University of California Health	<b>Michael Weiss</b> Vice President, Population Health, Children's Hospital of Orange County	<b>Sarah Soroken</b> Mental Health Clinician, Solano County Mental Health		<b>Stephen Shortell</b> Professor, UC Berkeley School of Public Health
<b>Travis Lakey</b> Chief Financial Officer, Mayers Memorial Hospital District	<b>Sumana Reddy</b> President, Acacia Family Medical Group	<b>Cristina Rodriguez</b> Physician Assistant, Altura Centers for Health		

Highlight indicates Subcommittee recommendation



# Draft Motion from the Subcommittee

- Approve Kassie Maroney to the Advisory Committee in the Payer category.
- This term ends on June 30, 2026.

# General Recruitment Reminder

OHCA is currently accepting submissions of interest to serve on the Advisory Committee.

- Selected members will serve a two-year term from July 1, 2026 - June 30, 2028.
- Submission of interest form is due by March 31, 2026.

# Advisory Committee Members – 28

Payers		Medical Groups		Purchasers		Consumer Representatives & Advocates		Organized Labor
Vacant		Hector Flores 	Medical Director, Family Care Specialists Medical Group	Ken Stuart 	Chairman, California Health Care Coalition	Carolyn Nava 	Senior Systems Change Advocate, Disability Action Center	Joan Allen Government Relations Advocate, SEIU United Healthcare Workers West
Manan Shah VP & General Manager, Commercial Business, Elevance Health / Anthem Blue Cross of California		Stacey Hrountas 	Chief Executive Officer, Sharp Rees-Stealy Medical Centers	Suzanne Usaj 	Senior Principal, Health and Benefits, Mercer	Mike Odeh 	Senior Director of Health, Children Now	Carmen Comsti Lead Regulatory Policy Specialist, California Nurses Association/National Nurses United
Andrew See Senior Vice President, Chief Actuary, Kaiser Foundation Health Plan		David Joyner	Chief Executive Officer, Hill Physicians Medical Group	Iftikhar Hussain	Chief Financial Officer, Salinas Valley Health	Kiran Savage-Sangwan	Executive Director, California Pan-Ethnic Health Network (CPEHN)	Janice O'Malley Legislative Advocate, American Federation of State, County and Municipal Employees
Hospitals		Physicians		Health Care Workers		Amanda McAllister-Wallner 	Executive Director, Health Access	Kati Bassler President, California Federation of Teachers, Salinas Valley
Barry Arbuckle President & Chief Executive Officer, MemorialCare Health System		Adam Dougherty 	Emergency Physician, Vituity	Stephanie Cline 	Respiratory Therapist, Kaiser	Marielle A. Reataza 	Executive Director, National Asian Pacific American Families Against Substance Abuse (NAPAFASA)	Academics/Researchers 
Tam Ma Associate Vice President, Health Policy and Regulatory Affairs, University of California Health		Michael Weiss	Vice President, Population Health, Children's Hospital of Orange County	Sarah Soroken	Mental Health Clinician, Solano County Mental Health	Stephen Shortell 	Professor, UC Berkeley School of Public Health	
Travis Lakey Chief Financial Officer, Mayers Memorial Hospital District		Sumana Reddy	President, Acacia Family Medical Group	Cristina Rodriguez 	Physician Assistant, Altura Centers for Health			

 Term ends on June 30, 2026

# Advisory Committee Member Selection Timeline

**January 5 - March 31**

Submission of Interest  
Open



**April - May**  
Analyzing submissions  
and Subcommittee  
Meetings



**June - July**

Present recommended  
slate to Board  
Appoint AC members



**July 8 or October 14,  
2026**  
First AC meeting for new  
appointees





**Office of Health Care Affordability**  
Department of Health Care Access and Information

# Public Comment





**Office of Health Care Affordability**  
Department of Health Care Access and Information

# Informational Items





Office of Health Care Affordability  
Department of Health Care Access and Information

# Hospital Sector Target Adjustments Methodology: Considering Resubmissions of Hospital Data

Vishaal Pegany, Deputy Director  
CJ Howard, Assistant Deputy Director



# Hospital Annual Financial Disclosure Report Background

- Annually, every fall, HCAI publishes the Hospital Annual Financial Disclosure Report (HAFDR) Complete Data Set.
- The regulatory process allows hospitals to resubmit prior year data.
- When HCAI publishes the Complete Data Set each fall, prior years are not modified or adjusted to reflect prior year resubmissions.
- The resubmissions are made available on HCAI's website via the SIERA system.

# High-Cost Outlier Hospital Sector Target Adjustment Background

- The Board's April 2025 action to adjust the sector target for high-cost outlier hospitals relied on the HCAI Complete Data Sets from FY 2018-2022.
- The refreshed analysis (FY 2019-2023) that the Office presented to the Board in December 2025 added the FY 2023 Complete Data Set, which was published in September 2025.
- The methodology included hospitals above the 85th percentile on unit and relative prices. This relative cutoff could mean if one hospital drops below the 85<sup>th</sup> percentile, another could then come into the 85<sup>th</sup> percentile.

# Current Hospital Data Resubmissions

- At the close of the December 2025 meeting, a hospital indicated that it had resubmitted prior year financial data and sought for the Board to consider the resubmitted data.
- After the December 2025 meeting, the hospital reached out to OHCA and indicated that it believes that were the Board to consider the resubmitted data from calendar years 2019-2022 that it would not meet the criteria that the Board used to adjust its target on the basis of it being a high-cost outlier within the hospital sector.
- OHCA has also learned of at least one other hospital with an adjusted sector target that has resubmitted their hospital annual financial disclosure reports for prior years.
- HCIA is still in the process of reviewing and validating these resubmitted data for one or more hospitals for one or more years.
- Given the pending status of the resubmitted data, OHCA has not re-run the target adjustment methodology and analysis based on these resubmitted data.

# Considerations for Board Discussion

- The Board may wish to consider more recently submitted and revised data
- Whenever data are submitted, the entity attests that the data are accurate.
- If an entity discovers an error or makes modifications for a prior year, these changes will reflect in future submissions.
- OHCA could consider resubmitted data during the progressive enforcement process.
- Hospitals may continually resubmit prior year data in an effort to fall below the 85<sup>th</sup> percentile.

# Considerations for Board Discussion

If the Board considers resubmitted data:

- The Office would need to determine and communicate to hospitals a date by which HCAI would need to receive resubmissions to ensure a fair and consistent process. Neither OHCA nor the Board have previously communicated guidance to hospitals regarding the process or timeframe by which the Board may consider resubmitted data.
- To date, HCAI has reviewed some facilities' resubmitted data, but other facilities' data are still pending validation. If the Board considered resubmitted data that HCAI has validated as of December 31, 2025, this may be perceived as unfair to a facility whose data is still pending validation.



# Board Discussion: Considering Resubmitted Data

Does the Board desire to modify the methodology used to adjust targets to consider resubmitted data?



**Office of Health Care Affordability**  
Department of Health Care Access and Information

# Public Comment





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# Update on Total Health Care Expenditures Data Submission Regulations (DSG 3.0)

Vishaal Pegany, Deputy Director



# 2026 Data Collection Regulatory Timeline

- Draft updates to regulations and DSG 3.0 released for public comment on January 5
- Comments due to [OHCA@HCAI.ca.gov](mailto:OHCA@HCAI.ca.gov) by **January 30, 2026**
- Anticipated submission to Office of Administrative Law by April 2026.
- Drafts available for review on HCAI website:  
<https://hcai.ca.gov/about/laws-regulations/>

# 2026 Data Collection Timeline





**Office of Health Care Affordability**  
Department of Health Care Access and Information

# Public Comment





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Department of Health Care Access and Information

# Exploring Drivers of Health Care Spending Across Commercial Payers

Andrew Feher, Research and Analysis Group Manager



# Background

- OHCA is statutorily required to analyze drivers of health care spending. In early 2025, OHCA began using the Health Care Payments Database (HPD) for this purpose.
- At the April 2025 HPD Advisory Committee, OHCA shared that it planned to explore how different factors – for example, aging, chronic condition prevalence, and utilization – might affect spending growth, both overall and at the payer-level.
- In June 2025, OHCA published its baseline report on health care spending for calendar years 2022 and 2023 and is using the HPD for supplemental analyses.
- At the October 2025 HPD Advisory Committee, OHCA presented a version of the forthcoming slides that masked health plan names.
- In November and December, OHCA shared identified summary statistics with each commercial health plan and met with those who requested a meeting.

# Key Distinctions

OHCA

HPD

## Purpose

Report on spending growth

Examine cost trends and cost drivers

## Granularity

Aggregate

Detailed

## Source

Financial / accounting systems

Claims / encounters systems

## Cycle

Collect two years of data annually

Monthly rolling

# Executive Summary

**Background:** OHCA's baseline report documented that, in the commercial market, total medical expenses per member per year (TME PMPY) increased by 5% from 2022 to 2023.

**Objective:** Use HPD data from 2022 and 2023 to examine commercial payer-level variation in (1) the average age of members, (2) the share of commercial members who used health care services and (3) the share of members with chronic conditions.

**Findings:** From 2022 to 2023, we find no meaningful change in the average age of members; we find that the utilization rate decreased for all payers; and chronic condition prevalence decreased for 4 out of 13 payers.

**Implications:** Since utilization decreased across all commercial payers, the observed increase in TME PMPY from OHCA's data collection is likely driven by other factors, such as higher prices or greater intensity of utilization, which we intend to explore in future analyses.

# Empirical Approach

- For this analysis, we used HPD data – specifically, the eligibility, medical and reference tables as well as a crosswalk for chronic conditions diagnosis codes and a crosswalk of HPD to OHCA submitters.
- We created a member-year-payer-level dataset for 2022 and 2023 to align with OHCA's baseline report.
- We excluded less than 0.5% of distinct members in the HPD from the analysis due to conflicting or incomplete age or gender information. From OHCA's data, about 0.1% of member equivalents are submitted with unknown gender; these data are excluded when examining concordance across the HPD and OHCA data.
- Based on these exclusions, we found that approximately 85% of OHCA member months are represented in the HPD data. The count of member months in OHCA's data is higher due to submission of some private self-insured enrollment.

# Key Metrics of Interest

- **Member Age:** The eligibility table reports an individual's age on a member-month basis. For this analysis, age was converted to one value per member per year. When a member's age increased by one year during the enrollment year, a midpoint age was assigned (e.g., 35.5 for individuals reported as 35 and 36 within the same year).
- **Utilization Rate:** Proportion of members who had at least one medical claim or encounter within a given calendar year, divided by the total number of members with coverage in the eligibility table during the same year.
- **Chronic Condition Rate:** Proportion of members who had at least one service incident in the medical table within a given calendar year containing a chronic condition diagnosis code, divided by the number of members with coverage in the eligibility table in that year.
- For the utilization and chronic condition measures, if an individual is covered by multiple health plans (Plan 1 and Plan 2) during the year and only accesses care with one of those plans (Plan 1), the individual will be counted as having utilization with Plan 1 but not Plan 2.

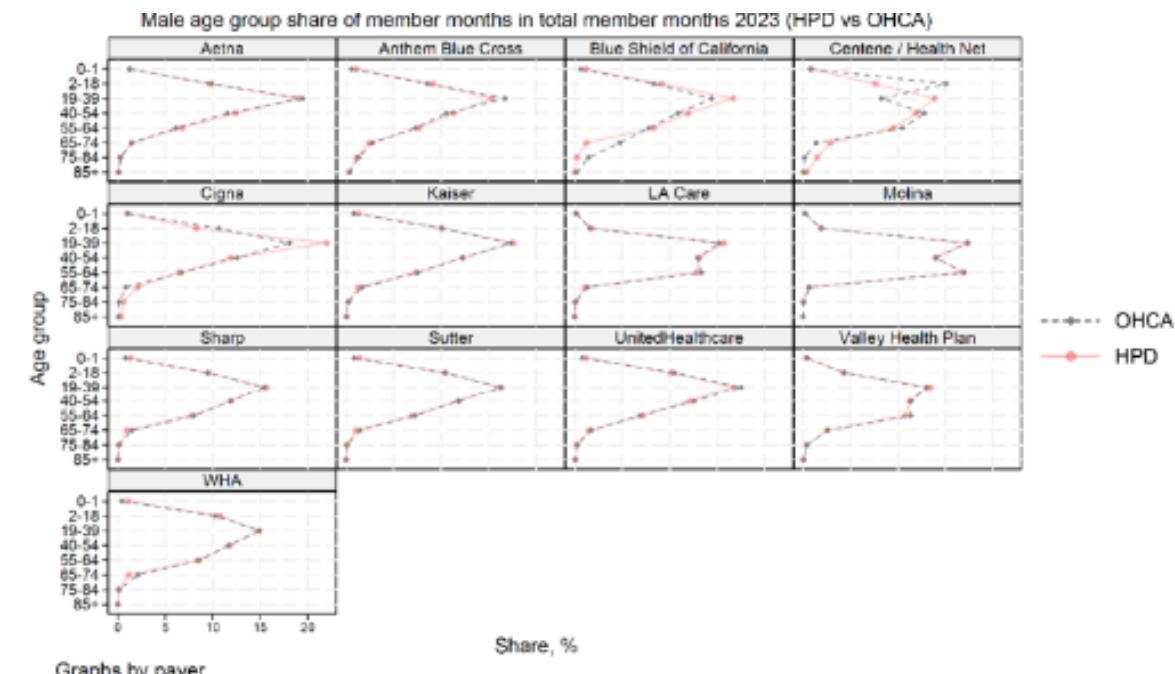
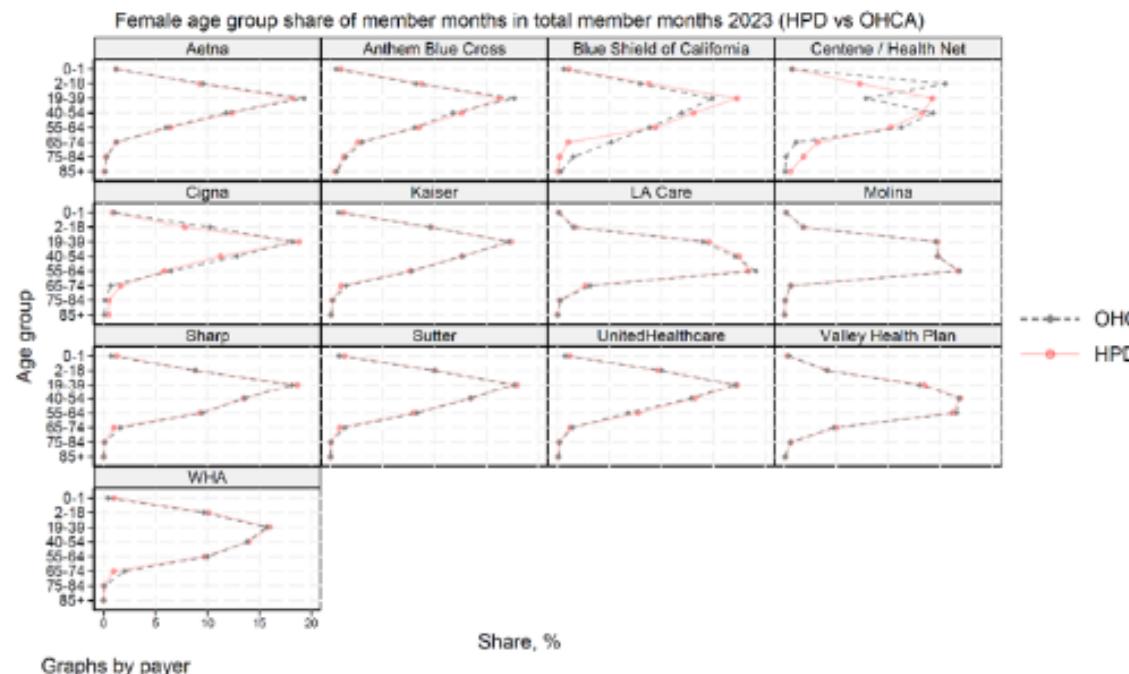
Note: The list of 30 chronic conditions and corresponding diagnosis codes are available at [CMS's Chronic Condition warehouse](#).

# Limitations

- Utilization and chronic conditions are based on medical service records. Excluding pharmacy claims could result in understated utilization rates.
- Our analysis focused on how many members use their health insurance coverage (the extensive margin of utilization) but not how much care a member may have used (the intensive margin). In future analyses, we intend to explore the latter.
- For this analysis, we focus on the commercial market. In future analyses, we intend to incorporate the Medicare Advantage market category.

# Gender Distribution Across HPD and OHCA Data Sources

To assess the extent to which we were able to effectively identify OHCA data submitters within the HPD, we began by comparing gender distributions across the HPD and OHCA data sources and found that they closely align for all but one payer.



# Age Composition

- For 10 commercial payers, average age changed by less than 0.3 years (3.6 months) between 2022 and 2023.
- Overall, commercial payers saw an increase in average age from 36.1 to 36.2 years between 2022 and 2023.

Age, mean (SD)	2022	2023
<b>Aetna</b>	34.6 (18.2)	34.8 (18.2)
<b>Anthem Blue Cross</b>	37.6 (20.0)	37.9 (20.0)
<b>Blue Shield of California</b>	36.2 (18.6)	36.3 (18.6)
<b>Centene / Health Net</b>	41.0 (20.0)	41.1 (20.3)
<b>Cigna</b>	35.0 (18.0)	35.2 (17.8)
<b>Kaiser</b>	35.0 (18.6)	35.1 (18.5)
<b>LA Care</b>	45.4 (15.0)	43.5 (15.7)
<b>Molina</b>	44.1 (15.6)	43.5 (15.7)
<b>Sharp</b>	35.6 (18.3)	35.5 (18.6)
<b>Sutter</b>	34.3 (18.2)	34.4 (18.2)
<b>UnitedHealthcare</b>	34.8 (18.4)	35.0 (18.5)
<b>Valley Health Plan</b>	44.6 (17.3)	43.5 (17.8)
<b>WHA</b>	35.7 (18.7)	35.8 (18.7)
<b>Market Average</b>	<b>36.1 (18.9)</b>	<b>36.2 (18.8)</b>

# Utilization Rate

- On average, payers saw a decrease in the share of members who used medical services from 76.7% in 2022 to 72.6% in 2023 (a 5.3% relative decrease).
- Kaiser had the highest share of members with utilization at 83.1% and 79.4% in 2022 and 2023.
- Cigna had the lowest share both in 2022 and 2023 at 41.0% and 36.9%, respectively.

	2022	2023	Percentage Change in share, %	Change in share, percentage points
Aetna	70.5%	66.7%	-5.5%	-3.8pp
Anthem Blue Cross	75.0%	71.7%	-4.4%	-3.3pp
Blue Shield of California	76.5%	71.3%	-6.9%	-5.2pp
Centene / Health Net	65.0%	62.5%	-3.7%	-2.4pp
Cigna	41.0%	36.9%	-9.9%	-4.1pp
Kaiser	83.1%	79.4%	-4.4%	-3.6pp
LA Care	59.7%	47.3%	-20.7%	-12.3pp
Molina	56.9%	47.4%	-16.7%	-9.5pp
Sharp	74.8%	72.8%	-2.7%	-2.0pp
Sutter	74.9%	72.8%	-2.8%	-2.1pp
UnitedHealthcare	70.2%	67.1%	-4.5%	-3.1pp
Valley Health Plan	66.4%	49.6%	-25.4%	-16.8pp
WHA	75.4%	73.6%	-2.3%	-1.8pp
Market Average	76.7%	72.6%	-5.3%	-4.1pp

# Covered California Utilization Rate

To assess the reasonableness of our utilization rate analysis, we looked to Covered California, which has used its claims database to report on both overall and payer-specific trends in utilization and similarly found a decrease in the utilization rate from 2022 to 2023 (88% down to 83%).



**QHP PERFORMANCE**  
**No Utilization of Care Over Time**

QHP Issuer	2019	2020	2021	2022	2023
All Population	18%	18%	9%	12%	17%
Anthem EPO	22%	20%	11%	15%	19%
Anthem HMO		21%	9%	14%	20%
Blue Shield HMO	17%	16%	9%	12%	16%
Blue Shield PPO	13%	12%	6%	9%	11%
Chinese Community HMO	29%	29%	15%	21%	28%
Health Net EPO	19%	17%	11%	13%	N/A
Health Net HMO	18%	20%	9%	11%	14%
Health Net PPO	33%	33%	21%	19%	24%
Kaiser HMO	17%	17%	8%	12%	16%
L.A. Care HMO	20%	21%	13%	16%	23%
Molina HMO	42%	31%	16%	23%	30%
Oscar EPO	26%	24%	10%	14%	18%
Sharp HMO	16%	16%	8%	13%	15%
Valley Health Plan HMO	29%	28%	14%	21%	28%
Western Health Advantage HMO	20%	18%	10%	13%	16%

 **COVERED CALIFORNIA** Values marked as high rate outliers (lower is better measure), based on z-scores or Interquartile Range, are identified with a red box. Lower rate outliers (lower is better) are identified with a blue circle. 90 Blank cells are suppressed data due to counts too low to report.  
N/A indicates plan was not offered that year

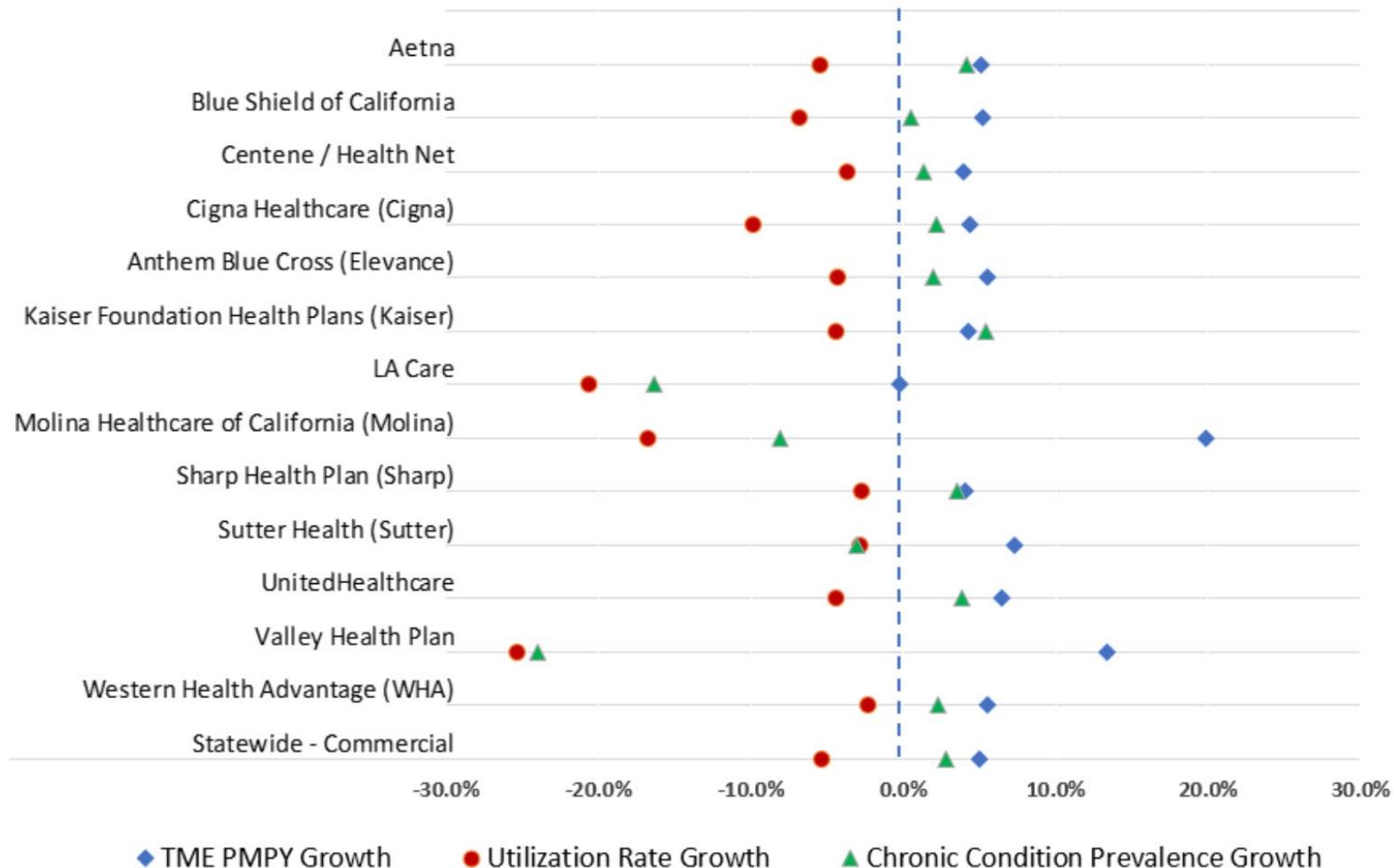
# Chronic Condition Rate

- On average, the share of members with a chronic condition diagnosis was 31.5% in 2022 and 32.4% in 2023 (a 2.9% increase).
- Several payers saw an increase in the share of members with a chronic condition diagnosis – 5.4% for Kaiser, 4.1% for Aetna and 3.6% for Sharp – while other payers saw a decrease.
- The largest decreases in the share of members with chronic conditions were:
  - Valley Health Plan from 37.9% to 28.8% (a 24% decrease),
  - LA Care from 34% to 28.5% (a 16.3% decrease) and
  - Molina from 32.9% to 30.2% (an 8% decrease).

	2022	2023	Percentage Change in share, %	Change in share, percentage points
<b>Aetna</b>	28.5%	29.7%	4.1%	1.2pp
<b>Anthem Blue Cross</b>	35.5%	36.2%	2.0%	0.7pp
<b>Blue Shield of California</b>	34.9%	35.1%	0.5%	0.2pp
<b>Centene / Health Net</b>	34.4%	34.8%	1.3%	0.5pp
<b>Cigna</b>	15.4%	15.8%	2.2%	0.3pp
<b>Kaiser</b>	29.7%	31.3%	5.4%	1.6pp
<b>LA Care</b>	34.0%	28.5%	-16.3%	-5.5pp
<b>Molina</b>	32.9%	30.2%	-8.0%	-2.6pp
<b>Sharp</b>	32.0%	33.1%	3.6%	1.1pp
<b>Sutter</b>	32.4%	31.4%	-3.1%	-1.0pp
<b>UnitedHealthcare</b>	30.2%	31.4%	3.9%	1.2pp
<b>Valley Health Plan</b>	37.9%	28.8%	-24.0%	-9.1pp
<b>WHA</b>	38.1%	39.0%	2.3%	0.9pp
<b>Market Average</b>	<b>31.5%</b>	<b>32.4%</b>	<b>2.9%</b>	<b>0.9pp</b>

# Change in Commercial Market TME PMPY, Utilization and Chronic Condition (2022 to 2023)

While TME PMPY increased across all but one commercial payer, utilization rates decreased, and the share of members with a chronic condition diagnosis increased for 9 out of 13 OHCA submitters.



# Takeaways and Next Steps

- In this analysis, OHCA used HPD data to build upon findings from its baseline report that featured aggregated total medical expense (TME) data.
- OHCA's baseline report documented that, from 2022 to 2023, total medical expense per member per year (TME PMPY) increased by 5.0% in the commercial market with variation across payers ranging from -0.2% to 19.8%.
- We explored three potential factors that may contribute to the spending growth and found that, from 2022 to 2023:
  - There was no meaningful change in the average age of members.
  - The share of members utilizing medical services decreased by 5.3% on average.
  - The share of members with chronic condition diagnosis increased by 2.9% on average.
- However, there was substantial variation in these metrics across payers.
- OHCA will continue use the HPD for cost driver analyses that build upon its statutorily required reports. In future analyses, we will explore price variation in shoppable services and intensity of utilization.



**Office of Health Care Affordability**  
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# Public Comment





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# Spending Target Enforcement: Performance Improvement Plan Follow-up

Vishaal Pegany, Deputy Director  
CJ Howard, Assistant Deputy Director



# Review of Board Discussion of Spending Target Enforcement Thus Far

- OHCA is collecting initial feedback from the Board, AC and the public to inform the development of spending target enforcement regulations in late 2026.
- Further opportunities for feedback will occur with the presentation of draft regulations, including a public workshop.
- So far, OHCA has had discussions of:
  - Assessing performance
  - Enforcement considerations
  - Technical assistance
  - Public testimony
  - Performance improvement plans

# Review of Board Discussion of Spending Target Enforcement Thus Far

The below chart presented at the July Board meeting shows the initial planned timeline for discussion on various enforcement topics ahead of the regulations process later this year.



\*Timeline from July 2025 Board Meeting (slide 75)

# Updated Timeline



- OHCA is gathering feedback July 2025 – June 2026
- A discussion on spending target penalties is scheduled for spring 2026
- OHCA will develop regulations from summer – October 2026

# Board Follow-Up Items

## Do entities have to go through a Performance Improvement Plan (PIP) before being assessed a penalty?

### Statute

**127500.5.(m)** It is the intent of the Legislature in enacting this chapter that enforcement actions to address growth in per capita total health care expenditures **are implemented in a progressive manner, such that health care entities are assisted to come into compliance with cost targets, including through technical assistance and performance improvement plans, before assessing administrative penalties** unless there are egregious violations as specified in Section 127502.5.

**127502.5.(a)** The director shall enforce the cost targets established by this chapter against health care entities in a manner that ensures compliance with targets, **allows each health care entity opportunities for remediation**, and ensures health care entities do not implement performance improvement plans in ways that are likely to erode access, quality, equity, or workforce stability.

**127502.5.(h)(1)** The director may directly assess administrative penalties when a health care entity has failed to comply with this chapter by doing any of the following:

- (A) Willfully failing to report complete and accurate data.
- (B) Repeatedly neglecting to file a performance improvement plan with the office.
- (C) Repeatedly failing to file an acceptable performance improvement plan with the office.
- (D) Repeatedly failing to implement the performance improvement plan.
- (E) Knowingly failing to provide information required by this section to the office.
- (F) Knowingly falsifying information required by this section.

# Board Follow-Up Items

**Do entities have to go through a Performance Improvement Plan (PIP) before being assessed a penalty?**

Yes, OHCA will first require a PIP before assessing a penalty, per statute's legislative intent that enforcement be progressive and that entities be assisted with coming into compliance via technical assistance and PIPs before being assessed a penalty.

PIPs also:

- Identify root causes of unaffordability by working with entities to make real lasting improvements.
- Create better understanding of how health care entities operate.
- Can identify meaningful interventions that may support other entities' PIPs and future state policy direction.

# Board Follow-Up Items

## **What is Oregon's cost target penalty?**

The Oregon Health Authority's financial penalty for exceeding a cost target is based on a percentage of excess spending that increases annually for repeated offenses. More information will be shared about their penalty in a later presentation on spending target penalties.

## **Does OHCA have the resources to require and monitor PIPs for potentially hundreds of entities.**

- OHCA is currently considering what resources are required for the PIP process.
- Ultimately, who proceeds to a PIP will depend on OHCA resources and the spending performance of entities year-to-year.

# Board Follow-Up Items

## Have entities in other states shown meaningful change due to a PIP?

- Massachusetts deemed Mass General Brigham's (MGB) PIP successful with a goal of \$176.7M vs \$197.1M in achieved savings in 18 months. The bulk of savings came from price reductions.
- MGB's strategies included:
  - **Price reductions** – reducing outpatient rates at multiple facilities, reducing rates to state-based marketplace coverage (ConnectorCare), and other insurance discounts - \$142.9M in achieved savings.
  - **Reducing utilization** – Integrated Care Management Program, SNF utilization reduction, MGB health plan utilization management, and MRI and CT utilization - \$48.1M in achieved savings.
  - **Shifting care to lower cost sites** – home hospital, virtual care - \$6.3M in achieved savings.
- Oregon also has PIP authority, but they have not yet required one.

# Board Follow-Up Items

**Would OHCA need to accept a greater role in telling entities what to include or focus on in their PIP?**

Only to the extent consistent with the law. OHCA has statutory responsibilities to ensure entities come into compliance with the targets and that PIP goals/strategies do not erode access, quality, equity, or workforce stability.

## Statute

**127502.5.(a)** The director shall enforce the cost targets established by this chapter against health care entities in a manner that ensures compliance with targets, allows each health care entity opportunities for remediation, and ensures health care entities do not implement performance improvement plans in ways that are likely to erode access, quality, equity, or workforce stability.

# Board Follow-Up Items

**Do PIPs allow entities to get out of complying with the spending target while they are implementing a PIP?**

No. When an entity misses a spending target while implementing a PIP, the statute provides OHCA with options to enforce the target, such as requiring modifications to the existing PIP, requiring a new PIP, or assessing penalties.

## Statute

**127502.5.(d)(1)** If the director determines that a health care entity is not compliant with an approved performance improvement plan and does not meet the cost target, the director may assess administrative penalties commensurate with the failure of the health care entity to meet the target. An entity that has fully complied with an approved performance improvement plan by the deadline established by the office shall not be assessed administrative penalties. However, the director may require a modification to the performance improvement plan until the cost target is met.

**127502.5.(d)(5)** If, after the implementation of one or more performance improvement plans, the health care entity is repeatedly noncompliant with the performance improvement plan, the director may assess escalating administrative penalties that exceed the penalties imposed under paragraphs (1) and (2) of this subdivision and paragraph (4) of subdivision (a).



**Office of Health Care Affordability**  
Department of Health Care Access and Information

# Public Comment





Office of Health Care Affordability  
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## General Public Comment

Written public comment can be emailed to:

[ohca@hcaci.ca.gov](mailto:ohca@hcaci.ca.gov)

To ensure that written public comment is included in the posted board materials, e-mail your comments at least 3 business days prior to the meeting.



Next Board Meeting:  
March 25, 2026  
10am

Location:  
2020 West El Camino Ave, Conference  
Room 900, Sacramento, CA 95833



**Office of Health Care Affordability**  
Department of Health Care Access and Information

# Adjournment

