

Template B: Delegation Justification and Plan

**Instructions:** Complete this template for each Subcontractor or Downstream Subcontractor. Contractor may not delegate for those contractual duties and obligations where delegation is legally or contractually prohibited. Responses must be limited to no more than ten (10) pages.

**Subcontractor or Downstream Subcontractor Name: Vision Service Plans (VSP)**

**Applicable County(ies): San Francisco**

**Subcontractor or Downstream Key Personnel: Christine Foote**

**Subcontractor Key Personnel Contact Information: christine.foote@vsp.com**

**Type of Subcontractor or Downstream Subcontractor:** Partially delegated

- a) **Justification of Subcontractor or Downstream Subcontractor Agreement:** VSP is the delegated vision provider. VSP is delegated for Claims, Credentialing, Cultural and Linguistics and New Provider Training.
- b) **Pre-Existing Relationships:** VSP has been the delegated vision provider since February 1999.
- c) **Sub-Delegation:** Delegate is not able to sub-delegate any SFHP-delegated activities without written permission from SFHP. Currently, none of the delegated functions are sub-delegated. If there came a time where sub-delegation was necessary and approved by SFHP, the delegate will be responsible for oversight of that activity, and SFHP maintains the risk for that activity. SFHP conducts annual audits of all delegated and contractually-required activities and, if any activities were sub-delegated, SFHP would include a review of the delegate's oversight in the SFHP review of that delegated function.
- d) **Impact on Contractor:** SFHP is responsible for oversight of all delegated functions via audits and report monitoring as described in the delegation agreement and reports Deliverable Index (RDI).

- e) **Contractor's Administrative Capacity to Oversee and Monitor Subcontractor and Downstream Subcontractor:** The Compliance and Oversight Department conducts annual audits of all delegated functions, in addition to monitoring all delegates on a monthly, quarterly, and semi-annual basis via report submission. If the delegate fails in any critical function, they will be placed on quarterly auditing for that function. The department is appropriately staffed.
- f) **Subcontractor's and Downstream Administrative Capacity:** Capacity for Administrative and Financial functions is reviewed at least annually.
- g) **Subcontractor's and Downstream Subcontractors' Compliance with Applicable Contractual Provisions:** Delegate's compliance with contract requirements are reviewed on an annual basis, via the annual oversight audit, and on a quarterly basis via the quarterly performance guarantee claims audit. Reports are reviewed on a monthly, quarterly, semi-annual, and annual basis. Program updates and guidance is distributed to providers via Provider Newsletters, emails, and Joint Administrative Meetings (JAMs) which occur at least semi-annually. Any new program requirements may require an attestation and/or evidence of implementation from the delegate. This process is managed in the Compliance and Oversight Department.
- h) **Contractor's Oversight Policy and Procedures:** The Delegation Agreement, approved by DHCS, provides the foundation for the requirements. In addition to the Contract, Delegation Agreement, and Reports Deliverable Index (RDI), specific details about implementation of program requirements, including the Provider Manual and other SFHP-issued guidance, can be found at [www.sfhp.org](http://www.sfhp.org) within the "Provider Resource" Section. Specific Delegation Oversight activities are detailed in SFHP Policies DO-01 Delegation Oversight Charter and DO-02 Oversight of Delegated Functions.
- i) **Financial Arrangement:** VSP is paid a capitation per member.
- j) **Other Information:** Include any other information that would assist DHCS in its review of Contractor's delegated structure.
- k) **Previously Approved Documents: (Applicable to annual submissions only)** If Contractor has previously submitted documentation to DHCS in connection with the Subcontractor Agreement or Downstream Subcontractor Agreement, either through the Request for Proposal (RFP) process or during the term of this Contract, Contractor must provide any such documentation.

Template B: Delegation Justification and Plan

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**Subcontractor or Downstream Subcontractor Name: University California San Francisco (UCSF)**

**Applicable County(ies): San Francisco**

**Subcontractor or Downstream Key Personnel: Michael Delane**

**Subcontractor Key Personnel Contact Information: delanem@ucsfmg.ucsf.edu**

**Type of Subcontractor or Downstream Subcontractor:** Partially delegated

- a) **Justification of Subcontractor or Downstream Subcontractor Agreement:** UCSF is delegated for Credentialing and New Provider Training.
- b) **Pre-Existing Relationships:** UCSF has been a delegate since October 2002.
- c) **Sub-Delegation:** Delegate is not able to sub-delegate any SFHP-delegated activities without written permission from SFHP. Currently, none of the delegated functions are sub-delegated. If there came a time where sub-delegation was necessary and approved by SFHP, the delegate will be responsible for oversight of that activity, and maintains the risk for that activity. SFHP conducts annual audits of all delegated and contractually-required activities and, if any activities were sub-delegated, SFHP would include a review of the delegate's oversight in the SFHP review of that delegated function.
- d) **Impact on Contractor:** SFHP is responsible for oversight of all delegated functions via audits and report monitoring as described in the delegation agreement and reports Deliverable Index (RDI).

- e) **Contractor's Administrative Capacity to Oversee and Monitor Subcontractor and Downstream Subcontractor:** The Compliance and Oversight Department conducts annual audits of all delegated functions, in addition to monitoring all delegates on a monthly, quarterly, and semi-annual basis via report submission. If the delegate fails in any critical function, they will be placed on quarterly auditing for that function. The department is appropriately staffed.
- f) **Subcontractor's and Downstream Administrative Capacity:** Capacity for Administrative and Financial functions is reviewed at least annually.
- g) **Subcontractor's and Downstream Subcontractors' Compliance with Applicable Contractual Provisions:** Delegate's compliance with contract requirements are reviewed at least on an annual basis, via the annual oversight audit. Reports are reviewed on a monthly, quarterly, semi-annual, and annual basis. Program updates and guidance is distributed to providers via Provider Newsletters, emails, and Joint Administrative Meetings (JAMs) which occur at least semi-annually. Any new program requirements may require an attestation and/or evidence of implementation from the delegate. This process is managed in the Compliance and Oversight Department.
- h) **Contractor's Oversight Policy and Procedures:** The Delegation Agreement, approved by DHCS, provides the foundation for the requirements. In addition to the Contract, Delegation Agreement, and Reports Deliverable Index (RDI), specific details about implementation of program requirements, including the Provider Manual and other SFHP-issued guidance, can be found at [www.sfhp.org](http://www.sfhp.org) within the "Provider Resource" Section. Specific Delegation Oversight activities are detailed in SFHP Policies DO-01 Delegation Oversight Charter and DO-02 Oversight of Delegated Functions.
- i) **Financial Arrangement:** SFHP pays UCSF an administrative fee per member per month. Claims are paid by SFHP on a Fee-for-Service basis.
- j) **Other Information:** Include any other information that would assist DHCS in its review of Contractor's delegated structure.
- k) **Previously Approved Documents: (Applicable to annual submissions only)** If Contractor has previously submitted documentation to DHCS in connection with the Subcontractor Agreement or Downstream Subcontractor Agreement, either through the Request for Proposal (RFP) process or during the term of this Contract, Contractor must provide any such documentation.

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**Subcontractor or Downstream Subcontractor Name:** Teledoc

**Applicable County(ies):** San Francisco

**Subcontractor or Downstream Key Personnel:** Jack Rose

**Subcontractor Key Personnel Contact Information:** jrose@teladochealth.com

**Type of Subcontractor or Downstream Subcontractor:** Partially delegated

- a) **Justification of Subcontractor or Downstream Subcontractor Agreement:** Teledoc is delegated for Credentialing and New Provider Training.
- b) **Pre-Existing Relationships:** Teledoc has been a delegate since 2018.
- c) **Sub-Delegation:** Delegate is not able to sub-delegate any SFHP-delegated activities without written permission from SFHP. Currently, none of the delegated functions are sub-delegated. If there came a time where sub-delegation was necessary and approved by SFHP, the delegate will be responsible for oversight of that activity, and maintains the risk for that activity. SFHP conducts annual audits of all delegated and contractually-required activities and, if any activities were sub-delegated, SFHP would include a review of the delegates's oversight in the SFHP review of that delegated function.
- d) **Impact on Contractor:** Contractor is responsible for oversight of all delegated functions via audits and report monitoring as described in the delegation agreement and reports Deliverable Index (RDI).

- e) **Contractor's Administrative Capacity to Oversee and Monitor Subcontractor and Downstream Subcontractor:** The Compliance and Oversight Department conducts annual audits of all delegated functions, in addition to monitoring all delegates on a monthly, quarterly, and semi-annual basis via report submission. If the delegate fails in any critical function, they will be placed on quarterly auditing for that function. The department is appropriately staffed.
- f) **Subcontractor's and Downstream Administrative Capacity:** A pre-delegation audit was conducted prior to the contracting with Teledoc. Capacity for Administrative and Financial functions is reviewed at least annually.
- g) **Subcontractor's and Downstream Subcontractors' Compliance with Applicable Contractual Provisions:** Delegate's compliance with contract requirements are reviewed at least on an annual basis, via the annual oversight audit. Reports are reviewed on a monthly, quarterly, semi-annual, and annual basis. Program updates and guidance is distributed to providers via Provider Newsletters, emails, and Joint Administrative Meetings (JAMs) which occur at least semi-annually. Any new program requirements may require an attestation and/or evidence of implementation from the delegate. This process is managed in the Compliance and Oversight Department.
- h) **Contractor's Oversight Policy and Procedures:** The Delegation Agreement, approved by DHCS, provides the foundation for the requirements. In addition to the Contract, Delegation Agreement, and Reports Deliverable Index (RDI), specific details about implementation of program requirements, including the Provider Manual and other SFHP-issued guidance, can be found at [www.sfhp.org](http://www.sfhp.org) within the "Provider Resource" Section. Specific Delegation Oversight activities are detailed in SFHP Policies DO-01 Delegation Oversight Charter and DO-02 Oversight of Delegated Functions.
- i) **Financial Arrangement:** SFHP pays Teledoc an administrative fee per member per month. Claims are paid by SFHP on a Fee-for-Service basis.
- j) **Other Information:** Include any other information that would assist DHCS in its review of Contractor's delegated structure.
- k) **Previously Approved Documents: (Applicable to annual submissions only)** If Contractor has previously submitted documentation to DHCS in connection with the Subcontractor Agreement or Downstream Subcontractor Agreement, either through the Request for Proposal (RFP) process or during the term of this Contract, Contractor must provide any such documentation.

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**Subcontractor or Downstream Subcontractor Name: San Francisco Health Network (SFHN)**

**Applicable County(ies): San Francisco**

**Subcontractor or Downstream Key Personnel: Stella Cao**

**Subcontractor Key Personnel Contact Information: stella.cao@sfdph.org**

**Type of Subcontractor or Downstream Subcontractor:** Partially delegated

- a) **Justification of Subcontractor or Downstream Subcontractor Agreement:** SFHN is delegated for Credentialing and New Provider Training.
- b) **Pre-Existing Relationships:** SFHN has been a delegate of SFHP since 1994. Prior to 2022, SFHN was fully delegated and SFHP was the Third party Administrator for Claims and UM. SFHN is now Fee-or-Service and maintains delegation for credentialing and new provider training only.
- c) **Sub-Delegation:** Delegate is not able to sub-delegate any SFHP-delegated activities without written permission from SFHP. Currently, none of the delegated functions are sub-delegated. If there came a time where sub-delegation was necessary and approved by SFHP, the delegate will be responsible for oversight of that activity, and maintains the risk for that activity. SFHP conducts annual audits of all delegated and contractually-required activities and, if any activities were sub-delegated, SFHP would include a review of the delegate's oversight in the SFHP review of that delegated function.
- d) **Impact on Contractor:** SFHP is responsible for oversight of all delegated functions via audits and report monitoring as described in the delegation agreement and reports Deliverable Index (RDI).

- e) **Contractor's Administrative Capacity to Oversee and Monitor Subcontractor and Downstream Subcontractor:** The Compliance and Oversight Department conducts annual audits of all delegated functions, in addition to monitoring all delegates on a monthly, quarterly, and semi-annual basis via report submission. If the delegate fails in any critical function, they will be placed on quarterly auditing for that function. The department is appropriately staffed.
- f) **Subcontractor's and Downstream Administrative Capacity:** Capacity for Administrative and Financial functions is reviewed at least annually.
- g) **Subcontractor's and Downstream Subcontractors' Compliance with Applicable Contractual Provisions:** Delegate's compliance with contract requirements are reviewed at least on an annual basis, via the annual oversight audit. Reports are reviewed on a monthly, quarterly, semi-annual, and annual basis. Program updates and guidance is distributed to providers via Provider Newsletters, emails, and Joint Administrative Meetings (JAMs) which occur at least semi-annually. Any new program requirements may require an attestation and/or evidence of implementation from the delegate. This process is managed in the Compliance and Oversight Department.
- h) **Contractor's Oversight Policy and Procedures:** The Delegation Agreement, approved by DHCS, provides the foundation for the requirements. In addition to the Contract, Delegation Agreement, and Reports Deliverable Index (RDI), specific details about implementation of program requirements, including the Provider Manual and other SFHP-issued guidance, can be found at [www.sfhp.org](http://www.sfhp.org) within the "Provider Resource" Section. Specific Delegation Oversight activities are detailed in SFHP Policies DO-01 Delegation Oversight Charter and DO-02 Oversight of Delegated Functions.
- i) **Financial Arrangement:** SFHN receives an administrative fee per month, per member. Claims are reimbursed by SFHP on a Fee-for-Service basis.
- j) **Other Information:** Include any other information that would assist DHCS in its review of Contractor's delegated structure.
- k) **Previously Approved Documents: (Applicable to annual submissions only)** If Contractor has previously submitted documentation to DHCS in connection with the Subcontractor Agreement or Downstream Subcontractor Agreement, either through the Request for Proposal (RFP) process or during the term of this Contract, Contractor must provide any such documentation.



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**Subcontractor or Downstream Subcontractor Name: Jade Healthcare Medical Group (JADE)**

**Applicable County(ies): San Francisco**

**Subcontractor or Downstream Key Personnel: Allen Chen**

**Subcontractor Key Personnel Contact Information: allchen@networkmedicalmanagement.com**

**Type of Subcontractor or Downstream Subcontractor:** Partially delegated

- a) **Justification of Subcontractor or Downstream Subcontractor Agreement:** Jade is delegated for Claims, Utilization Management, Credentialing, Case Management, Cultural and Linguistic Services (CLS) and New Provider Training.
- b) **Pre-Existing Relationships:** Jade has been a delegated subcontractor of SFHP since 2016, when Jade and Chinese Community Health Care Association (CCHCA) split into separate entities. Jade was purchased by their previous MSO, Network Medical Management, owned by the Apollo group, in September 2022.
- c) **Sub-Delegation:** Delegate is not able to sub-delegate any SFHP-delegated activities without written permission from SFHP. Currently, none of the delegated functions are sub-delegated. If there came a time where sub-delegation was necessary and approved by SFHP, the delegate will be responsible for oversight of that activity, and SFHP maintains the risk for that activity. SFHP conducts annual audits of all delegated and contractually-required activities and, if any activities were sub-delegated, SFHP would include a review of the delegate's oversight in the SFHP review of that delegated function.
- d) **Impact on Contractor:** SFHP is responsible for oversight of all delegated functions via audits and report monitoring as described in the delegation agreement and reports Deliverable Index (RDI).

- e) **Contractor's Administrative Capacity to Oversee and Monitor Subcontractor and Downstream Subcontractor:** The Compliance and Oversight Department conducts annual audits of all delegated functions, in addition to monitoring all delegates on a monthly, quarterly, and semi-annual basis via report submission. If the delegate fails in any critical function, they will be placed on quarterly auditing for that function. The department is appropriately staffed.
- f) **Subcontractor's and Downstream Administrative Capacity:** A pre-delegation audit was conducted prior to the contracting with Jade under the new ownership in September 2022. Capacity for Administrative functions and is reviewed at least annually.
- g) **Subcontractor's and Downstream Subcontractors' Compliance with Applicable Contractual Provisions:** Delegate's compliance with contract requirements are reviewed on an annual basis, via the annual oversight audit, and on a quarterly basis via the quarterly performance guarantee claims audit. Reports are reviewed on a monthly, quarterly, semi-annual, and annual basis. Program updates and guidance is distributed to providers via Provider Newsletters, emails, and Joint Administrative Meetings (JAMs) which occur at least quarterly. Any new program requirements may require an attestation and/or evidence of implementation from the delegate. This process is managed in the Compliance and Oversight Department.
- h) **Contractor's Oversight Policy and Procedures:** The Delegation Agreement, approved by DHCS, provides the foundation for the requirements. In addition to the Contract, Delegation Agreement, and Reports Deliverable Index (RDI), specific details about implementation of program requirements, including the Provider Manual and other SFHP-issued guidance, can be found at [www.sfhp.org](http://www.sfhp.org) within the "Provider Resource" Section. Specific Delegation Oversight activities are detailed in SFHP Policies DO-01 Delegation Oversight Charter and DO-02 Oversight of Delegated Functions.
- i) **Financial Arrangement:** Jade is paid a monthly capitation rate per member.
- j) **Other Information:** Include any other information that would assist DHCS in its review of Contractor's delegated structure.
- k) **Previously Approved Documents: (Applicable to annual submissions only)** If Contractor has previously submitted documentation to DHCS in connection with the Subcontractor Agreement or Downstream Subcontractor Agreement, either through the Request for Proposal (RFP) process or during the term of this Contract, Contractor must provide any such documentation.

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**Subcontractor or Downstream Subcontractor Name: Hill Physicians (Hill)**

**Applicable County(ies): San Francisco**

**Subcontractor or Downstream Key Personnel: David Joyner, CEO**

**Subcontractor Key Personnel Contact Information: 1221 Broadway Ste 700 Oakland, CA 94612 925-327-6710**

**Type of Subcontractor or Downstream Subcontractor:** Partially delegated

- a) **Justification of Subcontractor or Downstream Subcontractor Agreement:** Hill is delegated for Claims, UM, Credentialing, Care Management, CLS, and New Provider Training.
- b) **Pre-Existing Relationships:** Hill has been a contracted delegate of SFHP since June 2010.
- c) **Sub-Delegation:** Delegate is not able to sub-delegate any SFHP-delegated activities without written permission from SFHP. Currently, none of the delegated functions are sub-delegated, however, Hill has outsourced mailroom/claims clearinghouse/print functions to WCEDI. Inc. SFHP reviews mailroom process during the annual audit. If there came a time where sub-delegation was necessary and approved by SFHP, the delegate will be responsible for oversight of that activity, and SFHP maintains the risk for that activity. SFHP conducts annual audits of all delegated and contractually-required activities and, if any activities were sub-delegated, SFHP would include a review of the delegate's oversight in the SFHP review of that delegated function.
- d) **Impact on Contractor:** SFHP is responsible for oversight of all delegated functions via audits and report monitoring as described in the delegation agreement and reports Deliverable Index (RDI).

- e) **Contractor's Administrative Capacity to Oversee and Monitor Subcontractor and Downstream Subcontractor:** The Compliance and Oversight Department conducts annual audits of all delegated functions, in addition to monitoring all delegates on a monthly, quarterly, and semi-annual basis via report submission. If the delegate fails in any critical function, they will be placed on quarterly auditing for that function. The department is appropriately staffed.
- f) **Subcontractor's and Downstream Administrative Capacity:** A pre-delegation audit was conducted prior to the contracting with Hill. Capacity for Administrative and Financial functions is reviewed at least annually. Financial oversight occurs on a quarterly basis.
- g) **Subcontractor's and Downstream Subcontractors' Compliance with Applicable Contractual Provisions:** Delegate's compliance with contract requirements are reviewed at least on an annual basis, via the annual oversight audit. Reports are reviewed on a monthly, quarterly, semi-annual, and annual basis. Program updates and guidance is distributed to providers via Provider Newsletters, emails, and Joint Administrative Meetings (JAMs) which occur at least semi-annually. Any new program requirements may require an attestation and/or evidence of implementation from the delegate. This process is managed in the Compliance and Oversight Department.
- h) **Contractor's Oversight Policy and Procedures:** The Delegation Agreement, approved by DHCS, provides the foundation for the requirements. In addition to the Contract, Delegation Agreement, and Reports Deliverable Index (RDI), specific details about implementation of program requirements, including the Provider Manual and other SFHP-issued guidance, can be found at [www.sfhp.org](http://www.sfhp.org) within the "Provider Resource" Section. Specific Delegation Oversight activities are detailed in SFHP Policies DO-01 Delegation Oversight Charter and DO-02 Oversight of Delegated Functions.
- i) **Financial Arrangement:** Hill and SFHP have entered into a Split-Division of Financial responsibility (DOFR) arrangement. Hill is provided a monthly capitation payment for each assigned member and is responsible for outpatient professional services. SFHP maintains responsibility for inpatient and facility services.
- j) **Other Information:** Include any other information that would assist DHCS in its review of Contractor's delegated structure.
- k) **Previously Approved Documents: (Applicable to annual submissions only)** If Contractor has previously submitted documentation to DHCS in connection with the Subcontractor Agreement or Downstream Subcontractor Agreement, either through the Request for Proposal (RFP) process or during the term of this Contract, Contractor must provide any such documentation.

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**Subcontractor or Downstream Subcontractor Name:** Carelon

**Applicable County(ies):** San Francisco

**Subcontractor or Downstream Key Personnel:** Shelly Copeland

**Subcontractor Key Personnel Contact Information:** Sherry.Copeland@carelon.com

**Type of Subcontractor or Downstream Subcontractor:** Partially delegated

- a) **Justification of Subcontractor or Downstream Subcontractor Agreement:** Carelon is the delegated Non-Specialty Mental Health (NSMH) provider. Carelon is delegated for Claims, UM, Credentialing, Care Management, Cultural Linguistic Services and partially delegated for Grievances. Carelon is responsible for responding to and investigating Grievances; However, all grievance resolution letters must be approved by SFHP prior to sending.
- b) **Pre-Existing Relationships:** Carelon, formerly known as Beacon Health Strategies, has been the NSMH delegate for SFHP since 2014.
- c) **Sub-Delegation:** Delegate is not able to sub-delegate any SFHP-delegated activities without written permission from SFHP. Currently, none of the delegated functions are sub-delegated. If there came a time where sub-delegation was necessary and approved by SFHP, the delegate will be responsible for oversight of that activity, and SFHP maintains the risk for that activity. SFHP conducts annual audits of all delegated and contractually-required activities and, if any activities were sub-delegated, SFHP would include a review of the delegate's oversight in the SFHP review of that delegated function.
- d) **Impact on Contractor:** SFHP is responsible for oversight of all delegated functions via audits and report monitoring as described in the delegation agreement and reports Deliverable Index (RDI).

- e) **Contractor's Administrative Capacity to Oversee and Monitor Subcontractor and Downstream Subcontractor:** The Compliance and Oversight Department conducts annual audits of all delegated functions, in addition to monitoring all delegates on a monthly, quarterly, and semi-annual basis via report submission. If the delegate fails in any critical function, they will be placed on quarterly auditing for that function. The department is appropriately staffed.
- f) **Subcontractor's and Downstream Administrative Capacity:** A pre-delegation audit was conducted prior to the contracting with Carelon. Capacity for Administrative functions is reviewed at least annually.
- g) **Subcontractor's and Downstream Subcontractors' Compliance with Applicable Contractual Provisions:** Delegate's compliance with contract requirements are reviewed on an annual basis, via the annual oversight audit, and on a quarterly basis via the quarterly performance guarantee claims audit. Reports are reviewed on a monthly, quarterly, semi-annual, and annual basis. Program updates and guidance is distributed to providers via Provider Newsletters, emails, and Joint Administrative Meetings (JAMs) which occur at least quarterly. Any new program requirements may require an attestation and/or evidence of implementation from the delegate. This process is managed in the Compliance and Oversight Department.
- h) **Contractor's Oversight Policy and Procedures:** The Delegation Agreement, approved by DHCS, provides the foundation for the requirements. In addition to the Contract, Delegation Agreement, and Reports Deliverable Index (RDI), specific details about implementation of program requirements, including the Provider Manual and other SFHP-issued guidance, can be found at [www.sfhp.org](http://www.sfhp.org) within the "Provider Resource" Section. Specific Delegation Oversight activities are detailed in SFHP Policies DO-01 Delegation Oversight Charter and DO-02 Oversight of Delegated Functions.
- i) **Financial Arrangement:** Carelon is paid a monthly administrative fee per member. Carelon is responsible for processing and paying claims, on behalf of SFHP. SFHP reimburses actual claims expense via a monthly reconciliation process.
- j) **Other Information:** Include any other information that would assist DHCS in its review of Contractor's delegated structure.
- k) **Previously Approved Documents: (Applicable to annual submissions only)** If Contractor has previously submitted documentation to DHCS in connection with the Subcontractor Agreement or Downstream Subcontractor Agreement, either through the Request for Proposal (RFP) process or during the term of this Contract, Contractor must provide any such documentation.

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**Subcontractor or Downstream Subcontractor Name: Brown and Toland Physicians (BTP)**

**Applicable County(ies): San Francisco**

**Subcontractor or Downstream Key Personnel: Magda Lenartowicz, MD**

**Subcontractor Key Personnel Contact Information: 1221 Broadway Ste 700 Oakland, CA 94612**

**Type of Subcontractor or Downstream Subcontractor:** Partially delegated

- a) **Justification of Subcontractor or Downstream Subcontractor Agreement:** BTP is delegated for Claims, UM, Credentialing, Care Management, Cultural and Linguistics, and New Provider training.
- b) **Pre-Existing Relationships:** BTP has been a delegate of SFHP since September 2010.
- c) **Sub-Delegation:** Delegate is not able to sub-delegate any SFHP-delegated activities without written permission from SFHP. Currently, none of the delegated functions are sub-delegated. If there came a time where sub-delegation was necessary and approved by SFHP, the delegate will be responsible for oversight of that activity, and maintains the risk for that activity. SFHP conducts annual audits of all delegated and contractually-required activities and, if any activities were sub-delegated, SFHP would include a review of the delegate's oversight in the SFHP review of that delegated function.
- d) **Impact on Contractor:** Contractor is responsible for oversight of all delegated functions via audits and report monitoring as described in the delegation agreement and reports Deliverable Index (RDI).

- e) **Contractor's Administrative Capacity to Oversee and Monitor Subcontractor and Downstream Subcontractor:** The Compliance and Oversight Department conducts annual audits of all delegated functions, in addition to monitoring all delegates on a monthly, quarterly, and semi-annual basis via report submission. If the delegate fails in any critical function, they will be placed on quarterly auditing for that function. The department is appropriately staffed.
- f) **Subcontractor's and Downstream Administrative Capacity:** A pre-delegation audit was conducted prior to the contracting with BTP. Capacity for Administrative and Financial functions is reviewed at least annually. Financial oversight occurs on a quarterly basis.
- g) **Subcontractor's and Downstream Subcontractors' Compliance with Applicable Contractual Provisions:** Delegate's compliance with contract requirements are reviewed at least on an annual basis, via the annual oversight audit. Reports are reviewed on a monthly, quarterly, semi-annual, and annual basis. Program updates and guidance is distributed to providers via Provider Newsletters, emails, and Joint Administrative Meetings (JAMs) which occur at least semi-annually. Any new program requirements may require an attestation and/or evidence of implementation from the delegate. This process is managed in the Compliance and Oversight Department.
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- i) **Financial Arrangement:** BTP and SFHP have entered into a Split-Division of Financial responsibility (DOFR) arrangement. BTP is provided a monthly capitation payment for each assigned member and is responsible for outpatient professional services. SFHP maintains responsibility for inpatient and facility services.
- j) **Other Information:** Include any other information that would assist DHCS in its review of Contractor's delegated structure.
- k) **Previously Approved Documents: (Applicable to annual submissions only)** If Contractor has previously submitted documentation to DHCS in connection with the Subcontractor Agreement or Downstream Subcontractor Agreement, either through the Request for Proposal (RFP) process or during the term of this Contract, Contractor must provide any such documentation.



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**Subcontractor or Downstream Subcontractor Name: American Specialty Health (ASH)**

**Applicable County(ies): San Francisco**

**Subcontractor or Downstream Key Personnel: Hannah Wojtala**

**Subcontractor Key Personnel Contact Information: hannahw@ashn.com**

**Type of Subcontractor or Downstream Subcontractor: Partially delegated**

- a) **Justification of Subcontractor or Downstream Subcontractor Agreement:** American Specialty Health is a specialty health plan contracted with SFHP for Chiropractic services. ASH is delegated for Claims, Utilization Management, Cultural and Linguistics, and Credentialing, as it relates to Chiropractic services, for all SFHP members, regardless of assigned network.
- b) **Pre-Existing Relationships:** ASH has been a delegate for Chiropractic services since 2018.
- c) **Sub-Delegation:** Delegate is not able to sub-delegate any SFHP-delegated activities without written permission from SFHP. Currently, none of the delegated functions are sub-delegated. If there came a time where sub-delegation was necessary and approved by SFHP, the delegate will be responsible for oversight of that activity, and maintains the risk for that activity. SFHP conducts annual audits of all delegated and contractually-required activities and, if any activities were sub-delegated, SFHP would include a review of the delegate's oversight in the SFHP review of that delegated function.
- d) **Impact on Contractor:** Contractor is responsible for oversight of all delegated functions via audits and report monitoring as described in the delegation agreement and reports Deliverable Index (RDI).

- e) **Contractor's Administrative Capacity to Oversee and Monitor Subcontractor and Downstream Subcontractor:** The Compliance and Oversight Department conducts annual audits of all delegated functions, in addition to monitoring all delegates on a monthly, quarterly, and semi-annual basis via report submission. If the delegate fails in any critical function, they will be placed on quarterly auditing for that function. The department is appropriately staffed.
- f) **Subcontractor's and Downstream Administrative Capacity:** A complete pre-delegation audit was conducted prior to contracting with ASH. Capacity for Administrative and Financial functions is reviewed at least annually. Financial oversight occurs on a quarterly basis.
- g) **Subcontractor's and Downstream Subcontractors' Compliance with Applicable Contractual Provisions:** Delegate's compliance with contract requirements are reviewed at least on an annual basis, via the annual oversight audit. Reports are reviewed on a monthly, quarterly, semi-annual, and annual basis. Program updates and guidance is distributed to providers via Provider Newsletters, emails, and Joint Administrative Meetings (JAMs) which occur at least semi-annually. Any new program requirements may require an attestation and/or evidence of implementation from the delegate. This process is managed in the Compliance and Oversight Department. Please review Template C Contract Requirements Grid in Exhibit J.
- h) **Contractor's Oversight Policy and Procedures:** The Delegation Agreement, approved by DHCS, provides the foundation for the requirements. In addition to the Contract, Delegation Agreement, and Reports Deliverable Index (RDI), specific details about implementation of program requirements, including the Provider Manual and other SFHP-issued guidance, can be found at [www.sfhp.org](http://www.sfhp.org) within the "Provider Resource" Section. Specific Delegation Oversight activities are detailed in SFHP Policies DO-01 Delegation Oversight Charter and DO-02 Oversight of Delegated Functions.
- i) **Financial Arrangement:** ASH is provided a monthly capitation per member.
- j) **Other Information:** Include any other information that would assist DHCS in its review of Contractor's delegated structure.
- k) **Previously Approved Documents: (Applicable to annual submissions only)** If Contractor has previously submitted documentation to DHCS in connection with the Subcontractor Agreement or Downstream Subcontractor Agreement, either through the Request for Proposal (RFP) process or during the term of this Contract, Contractor must provide any such documentation.

Template B: Delegation Justification and Plan

**Instructions:** Complete this template for each Subcontractor or Downstream Subcontractor. Contractor may not delegate for those contractual duties and obligations where delegation is legally or contractually prohibited. Responses must be limited to no more than ten (10) pages.

**Subcontractor or Downstream Subcontractor Name: Asian American Medical Group (AAMG)**

**Applicable County(ies): San Francisco**

**Subcontractor or Downstream Key Personnel: Allen Chen**

**Subcontractor Key Personnel Contact Information: allchen@networkmedicalmanagement.com**

**Type of Subcontractor or Downstream Subcontractor: Partially delegated**

- a) **Justification of Subcontractor or Downstream Subcontractor Agreement:** AAMG is delegated for Claims, Utilization Management, Credentialing, Care Management, and Cultural and Linguistics.
- b) **Pre-Existing Relationships:** AAMG was purchased by the Apollo Group in March 2023. Apollo purchased the previous Chinese Community Health Care Association (CCHCA) Medi-Cal Contract at that time. Prior to that, CCHCA has been a contracted delegate of SFHP since 1996.
- c) **Sub-Delegation:** Delegate is not able to sub-delegate any SFHP-delegated activities without written permission from SFHP. Currently, none of the delegated functions are sub-delegated. If there came a time where sub-delegation was necessary and approved by SFHP, the delegate will be responsible for oversight of that activity, and maintains the risk for that activity. SFHP conducts annual audits of all delegated and contractually-required activities and, if any activities were sub-delegated, SFHP would include a review of the delegate's oversight in the SFHP review of that delegated function.
- d) **Impact on Contractor:** Contractor is responsible for oversight of all delegated functions via audits and report monitoring as described in the delegation agreement and reports Deliverable Index (RDI).

- e) **Contractor's Administrative Capacity to Oversee and Monitor Subcontractor and Downstream Subcontractor:** The Compliance and Oversight Department conducts annual audits of all delegated functions, in addition to monitoring all delegates on a monthly, quarterly, and semi-annual basis via report submission. If the delegate fails in any critical function, they will be placed on quarterly auditing for that function. The department is appropriately staffed.
- f) **Subcontractor's and Downstream Administrative Capacity:** A pre-delegation audit was conducted prior to the purchase of CCHCA. Capacity for Administrative and Financial functions is reviewed at least annually. Financial oversight occurs on a quarterly basis.
- g) **Subcontractor's and Downstream Subcontractors' Compliance with Applicable Contractual Provisions:** Delegate's compliance with contract requirements are reviewed at least on an annual basis, via the annual oversight audit. Reports are reviewed on a monthly, quarterly, semi-annual, and annual basis. Program updates and guidance is distributed to providers via Provider Newsletters, emails, and Joint Administrative Meetings (JAMs) which occur at least semi-annually. Any new program requirements may require an attestation and/or evidence of implementation from the delegate. This process is managed in the Compliance and Oversight Department.
- h) **Contractor's Oversight Policy and Procedures:** The Delegation Agreement, approved by DHCS, provides the foundation for the requirements. In addition to the Contract, Delegation Agreement, and Reports Deliverable Index (RDI), specific details about implementation of program requirements, including the Provider Manual and other SFHP-issued guidance, can be found at [www.sfhp.org](http://www.sfhp.org) within the "Provider Resource" Section. Specific Delegation Oversight activities are detailed in SFHP Policies DO-01 Delegation Oversight Charter and DO-02 Oversight of Delegated Functions.
- i) **Financial Arrangement:** Delegate is provided a monthly capitation payment per assigned member on a monthly basis.
- j) **Other Information:** Include any other information that would assist DHCS in its review of Contractor's delegated structure.
- k) **Previously Approved Documents: (Applicable to annual submissions only)** If Contractor has previously submitted documentation to DHCS in connection with the Subcontractor Agreement or Downstream Subcontractor Agreement, either through the Request for Proposal (RFP) process or during the term of this Contract, Contractor must provide any such documentation.