

2023-103 AUDIT SCOPE AND OBJECTIVES
Departments of Health Care Services and Public Health—
Comprehensive Perinatal Services Program

The audit by the California State Auditor will provide independently developed and verified information related to the Department of Health Care Services' and the California Department of Public Health's implementation of Medi-Cal's Comprehensive Perinatal Services Program (CPSP). The audit's scope will include, but not be limited to, the following activities:

1. Review and evaluate the laws, rules, and regulations significant to the audit objectives.
2. Analyze Medi-Cal data to determine the following:
 - (a) CPSP utilization rates for Medi-Cal beneficiaries enrolled in a managed care plan versus a fee-for-service plan.
 - (b) CPSP utilization rates for Medi-Cal beneficiaries during pregnancy and during both the 60-day postpartum period and the recently extended 12-month postpartum period.
3. Evaluate the guidance that DHCS and CDPH provide to plans and providers to determine the following:
 - (a) The extent to which the State communicates the availability of CPSP to plans, providers, and beneficiaries, including fee-for-service beneficiaries.
 - (b) Whether the State's contracts and policies clearly specify the roles and responsibilities of the managed care plans relating to timely access to CPSP benefits.
 - (c) The extent to which the State requires managed care plans to educate providers on the CPSP benefit.
 - (d) Whether the Medi-Cal Member Handbook includes and adequately describes CPSP benefits.
 - (e) The extent to which the State ensures that the component services of CPSP, including health education, nutrition counseling, and psychosocial services, are provided to pregnant and postpartum Medi-Cal beneficiaries. Determine whether the State's approach varies under managed care plans versus fee-for-service.
4. Identify any internal or external reviews relevant to CPSP—such as the triennial plan review—and determine the following:
 - (a) The degree to which these reviews examine CPSP, including trimester and postpartum assessments, individualized care plans, and follow up services.
 - (b) How long the reviews have evaluated CPSP, and the extent to which these reviews have resulted in meaningful findings and actionable recommendations for program improvement.

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5. Determine what steps DHCS or CDPH can take—including any enforcement mechanisms it may possess—to hold managed care plans or fee-for-service providers accountable when deficiencies related to CPSP benefits are identified. To the extent possible, determine the extent to which either agency has used these enforcement mechanisms and to what effect.
6. For a selection of local Perinatal Services Coordinators (PSCs), determine whether they review the medical information of Medi-Cal beneficiaries who are receiving—or who should be receiving— CPSP benefits. Determine whether CDPH or DHCS obtains the results of the PSC reviews and evaluate how the departments use this information.
7. Determine whether there are any regulatory or policy restrictions prohibiting CPSP services from being provided in homes or in a community setting. To the extent possible, evaluate the effect of these restrictions.
8. Review and assess any other issues that are significant to the audit.