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**Central California Alliance for Health Questions/Comments to the Department of Health Care Services:
Value-Based Payment Program and Developmental and Trauma Screening**

Value-Based Payment Program

- Clarification will need to be provided as to the:
 - Methodology and coding of the measure calculations.
 - The Health Plan's preference is to align with NCQA HEDIS methodology and the additional coding information that may be found outside of encounter data. Criteria like provider specialty, continuous enrollment would need to be defined as a requirement or not in an updated description of the measure set. Dependent on the measure methodology, this could be very labor intensive for the health plans or providers. What will be the role of the health plan in programming the measures, and support provided from the state to the health plan for SME time in programming customized measures if derived from a base of HEDIS-like methodology?
 - Distribution of funding and administration for the Health Plan.
 - Will the provider funding be allocated based upon health plan enrollment of members or other qualifiers?
 - Will the payment need to be at the rendering provider level, clinic, or tax ID?
 - Would the payment go to PCPs, midlevel's, or specialists and would there be different payment based on specialty?
 - Recommend inclusion or support for FQHCs and RHCs, or explanation for eliminating participation in the program.
 - Expectation for follow-up from the state after this week's comment period from the health plans.
 - Would health plans have the opportunity to provide additional feedback when new material or information is distributed
 - What other information will be provided to the health plans, and the expected time period?
 - Benchmarking for the incentives.
 - What benchmarks will be used? Will it be tiered benchmarking based on percentile ranking or improvement increase to allow providers to achieve reasonable goals?
- As an alternative, could DHCS consider increasing payment to individual services targeted in this proposal, or place an emphasis of increased provider payment to child measures?

Developmental screenings/Trauma screening

- Will DHCS allow the option of using other standardized tools for the screenings? Or provide a list of approved standardized tools?