

March 3, 2026

THIS LETTER SENT VIA EMAIL

Ms. Christy Bosse
Senior Vice President & CA Compliance Officer
Health Net Community Solutions, Inc.
21281 Burbank Blvd
Woodland Hills, CA 91367

CAP RESPONSE REGARDING PROVIDER SCREENING, ENROLLMENT AND
CREDENTIALING, AND INTEROPERABILITY REQUIREMENTS, WITH IMPACTS TO
PROVIDER DIRECTORY

Dear Ms. Bosse,

On December 12, 2025, the Department of Health Care Services (DHCS) sent Health Net Community Solutions, Inc. (Health Net) a Notice of Deficiency (NOD) pursuant to Dental Managed Care plan (Dental MCP) Boilerplate Contract Exhibit A8 Section 9 and Exhibit A14.4 Subsection 5.d, All Plan Letter (APL) 25-010, 22-013, and 18-004.

Health Net submitted a Corrective Action Plan (CAP) to DHCS on January 9, 2026, and a revised CAP on February 2, 2026. DHCS has reviewed and has determined that Health Net has not yet satisfactorily resolved the CAP findings pursuant to the Dental MCP Contract and APLs 25-010, 22-013, and 18-004 as required by the NOD.

On the enclosed CAP Response Form, DHCS has reviewed and responded to the findings. All CAP findings remain Open. Please complete the CAP Response Form and submit supporting documentation.

DHCS is requesting that Health Net provide an updated CAP with documentation within thirty (30) days of this letter, pursuant to APL 22-009. Should you have any questions regarding this response, please email dmcdeliverables@dhcs.ca.gov.



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Please note, if you are unable to correct the noted deficiencies and/or complete the CAP within six (6) months of receiving notice of violation from DHCS, DHCS may exercise its right pursuant to APL 22-009: Enforcement Actions: Administrative and Monetary Sanctions, Provision 3, Termination, Provision 18, Sanctions or Provision 19, Liquid Damages Provision in Exhibit E, Additional Provisions, of the contract.

Sincerely,

Original signed by:

Dana Durham
Chief, Medi-Cal Dental Services Division
Department of Health Care Services

Enclosure: CAP Response Form

Corrective Action Plan Response Form

Dental Managed Care Plan: Health Net Community Solutions, Inc.

The Medi-Cal Dental Managed Care plan (Dental MCP) is required to submit a corrective action plan (CAP) within 30 calendar days. The CAP response must include completion of the prescribed columns below to include a description of the corrective action, a list of all supporting documentation submitted, and the CAP implementation date. For systemic deficiencies that may be reasonably determined to require long-term corrective action for a period longer than 30 days to fully remediate or operationalize, the Dental MCP must demonstrate that sufficient progress has been made toward implementation of the CAP. In those instances, the Dental MCP is required to include the dates for key milestones as well as when full compliance will be achieved. CAP reporting on the deficiency(ies) will continue through demonstrative compliance.

The Dental Managed Care Unit of the Department of Health Care Services will maintain close communication with the Dental MCP throughout the CAP review process and provide technical assistance as needed.

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p>Health Net did not comply with Exhibit A14.4 Subsection 5. d.</p> <ul style="list-style-type: none"> » ADA status was not displayed in either the electronic or hard copy provider directories. This was due to the 	<p>System Updates:</p> <ul style="list-style-type: none"> » 1/9/26: The API was updated to pull ADA details from the source system into the online directory (Attachment A). » 1/9/26: ADA data was collected from 	<p>System Updates:</p> <ul style="list-style-type: none"> » 1/9/26: Attachment A CDN API Screenshots » 1/9/26: Attachment B-DQ.HN Online 	<p>System Updates:</p> <ul style="list-style-type: none"> » 1/9/26: ADA API-12/10/25 » 1/9/26: Online Directories 12/19/25 » 1/9/26: PDF of the paper Directory 12/22/25 	<p>3/3/26: DHCS accepts the submitted documentation. DHCS finds that the Provider Directory is missing requirements consistent with APL 25-010, including inaccuracies with pregnant women</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p>absence of ADA information in the source system and API's inability to transmit this data to the electronic/hard copy directories.</p> <p>» 2/2/26: Two additional fields within the provider directory are not displayed: Accepting Pregnant Women and Cultural Competency Indicators. Note: Per DHCS request via email dated 1/29/26 the Plan is adding the corrective action steps for this issue to this CAP response.</p>	<p>502 provider locations, entered into the source system, and reflected in online and paper directories 12/22/25 (Attachments B, C, E).</p> <p>» 2/2/26: Conducted a complete audit of the provider directories in January 2026. Addition of missing indicators for Accepting Pregnant Women and Cultural Competency to be completed by 2/28/26.</p> <p>Controls Implemented:</p>	<p>Provider Directory 1.2026</p> <p>» 1/9/26: Attachment C-CA HNET SAC Dec 22 2025 and Attachment C-CA HNET LA-Dec 22 2025</p> <p>» 1/9/26: Attachment E-GOV CA Network GID Query 12.18.2025</p> <p>Controls Implemented:</p> <p>» 1/9/26: Attachment D New Provider Checklist 12.2026</p> <p>» 1/9/26: Attachment D-CA_PE.001_Provider Engagement New Provider</p>	<p>» 2/2/26: Indicators for Accepting Pregnant Women and Cultural Competency 2/28/26.</p> <p>Controls Implemented:</p> <p>» 1/9/26: Provider Checklist and Policy 1/1/2026</p> <p>» 1/9/26: Provider Engagement Training Attestation 1/5/26</p> <p>» 1/9/26: Verification audits performed weekly 1/5/2026.</p>	<p>and cultural competency. This CAP remains open.</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<ul style="list-style-type: none"> » 1/9/26: An ADA verification process was added to onsite onboarding visits effective 1/1/2026 (Attachment D). » 1/9/26: Contracts are no longer accepted as complete and final without ADA verification; only complete contracts may be accepted effective 1/1/2026 (Attachment D). » 1/9/26: Weekly ADA indicator reports will be reviewed for quality control effective 12/19/2025. 	<p>Credentialing Process</p> <ul style="list-style-type: none"> » 1/9/26: Attachment D New Provider Policy Timeline Training Attestation 		

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p>Health Net did not comply with APL 22-013.</p> <ul style="list-style-type: none"> » The provider directory did not include ADA information because the API failed to transmit the data, and the source system did not consistently capture or maintain it. 	<p>Actions Taken to Address Missing ADA Data:</p> <ul style="list-style-type: none"> » 1/9/26: API Update – The API was modified to pull ADA details into the online provider directory (Attachment A). » 1/9/26: Source System Update – ADA data was collected from 502 provider locations and entered into the source system. On 12/19/2025, the updated data flowed into both online and paper directories (Attachments B, C, E). » 1/9/26: Policy & Training – A new 	<p>API Updates:</p> <ul style="list-style-type: none"> » 1/9/26: Attachment A- CDN API Screenshots <p>Source System:</p> <ul style="list-style-type: none"> » 1/9/26: Attachment B-DQ.HN Online Provider Directory 1.2026 » 1/9/26: Paper Directories Attachment C-CA HN SAC Dec 22 2025 and Attachment C-CA HNET LA – Dec 22 2025 » 1/9/26: Indicator in source system Attachment E-GOV CA Network GID Query 12.18.2025 	<ul style="list-style-type: none"> » 1/9/26: Online Directories- 12/19/25 » 1/9/26: PDF provider directory with ADA indicator- 12/22/25 » 1/9/26: New Policy effective 1/1/2026 » 1/9/26: New Policy training attestation email 1/5/2026 	<p>3/3/26: DHCS accepts the submitted documentation. DHCS finds that the Provider Directory is missing requirements consistent with APL 25-010 and APL 22-013. This CAP remains open.</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>policy requiring ADA data collection during enrollment became effective 1/1/2026, and Provider Engagement staff were trained on 1/5/2026 (Attachment D).</p>	<p>Policy & Training:</p> <ul style="list-style-type: none"> » 1/9/26: Attachment D New Provider Checklist 12.2026 » 1/9/26: Attachment D CA_PE.001_Provider Engagement New Provider Credentialing Process » 1/9/26: Attachment D New Provider Policy Timeline Training Attestation 		
<p>Health Net did not comply with APL 18-004 and Exhibit A8, Section 9 Provider Network screening, enrollment, credentialing requirements.</p>	<p>Actions Taken:</p> <ul style="list-style-type: none"> » 1/9/26: Created a new policy requiring ADA information as a mandatory field for all provider contracts. Provider 	<ul style="list-style-type: none"> » 1/9/26: Attachment D New Provider Checklist 12.2026 » 1/9/26: Attachment D-CA_PE.001_Provider Engagement 	<ul style="list-style-type: none"> » 1/9/26: New Policy effective 1/1/2026 » 1/9/26: New Policy training attestation email 1/5/2026 	<p>3/3/26: DHCS accepts the submitted documentation. DHCS requests documentation that provider screening, enrollment, and credentialing will be</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p>» The plan did not collect ADA information during network enrollment. As a result, the Credentialing team defaulted the ADA indicator in the source system to “No” to maintain data integrity when information was unavailable.</p>	<p>Engagement will collect this data during enrollment, and incomplete contracts will be returned. Policy effective 1/1/2026 (Attachment D).</p> <p>» 1/9/26: PE staff completed training on 1/5/2026 (Attachment D).</p>	<p>New Provider Credentialing Process</p> <p>» 1/9/26: Attachment D New Provider Policy Timeline Training Attestation</p>		<p>inclusive of all requirements pursuant to APL 25-010, as there are additional fields missing on the provider directory. This CAP remains open.</p>
<p>Health Net did not comply with APL 25-010</p> <p>» ADA status was not shown in either the electronic or paper provider directories because the source system</p>	<p>Actions Taken:</p> <p>» 1/9/26: Policy & Process – Created a new policy requiring ADA information as a mandatory field for all provider contracts. Provider Engagement (PE) collects this data</p>	<p>Policy & Process:</p> <p>» 1/9/26: New Attachment D New Provider Checklist 12.2026</p> <p>» 1/9/26: Attachment D-CA_PE.001_Provider Engagement New Provider</p>	<p>Policy & Process:</p> <p>» 1/9/26: Provider Checklist and Policy 1/1/2026</p> <p>» 1/9/26: Provider Engagement Staff trained 1/5/26</p> <p>System & Directory:</p> <p>» 1/9/26: ADA- API- 12/10/25</p>	<p>3/3/26: DHCS accepts the submitted documentation. DHCS finds that the Provider Directory is missing requirements consistent with APL 25-010, including inaccuracies with pregnant women and cultural competency.</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p>lacked ADA details and the API did not transmit this data.</p>	<p>during enrollment, and incomplete contracts are returned. Policy effective 1/1/2026; PE staff trained 1/5/2026 (Attachment D).</p> <p>» 1/9/26: System & Directory Updates – On 12/10/2025, the API was updated to include ADA status in the online directory. ADA data was collected from 502 provider locations and entered into the source system on 12/19/2025, enabling updates to online and paper directories. Updated PDFs were provided to the vendor on</p>	<p>Credentialing Process</p> <p>» 1/9/26: Attachment D New Provider Policy Timeline Training Attestation</p> <p>System & Directory:</p> <p>» 1/9/26: API- Attachment A- CDN API Screenshots</p> <p>» 1/9/26: Electronic Directories- Attachment B- DQ.HN Online Provider Directory 1.2026</p> <p>» 1/9/26: Paper Directories Attachment C-CA HN SAC Dec 22 2025 and Attachment C-CA</p>	<p>» 1/9/26: Online Directories- 12/19/25</p> <p>» 1/9/26: PDF of the Paper Directory- 12/22/25</p>	<p>This CAP remains open.</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	12/22/2025 (Attachments A, B, C, E).	HNET LA – Dec 22 2025 » 1/9/26: Indicator in source system Attachment E-GOV CA Network GID Query 12.18.2025		