

Corrective Action Plan Response Form

Dental MCP: Health Net Community Solutions, Inc.

Review Period: 4/1/2024-12/31/2024

Audit Type: Department of Health Care Services Dental Audit

On-Site Review: 9/2/2025-9/12/2025

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
1.3.1 Prior Authorization Appeals: The Plan did not ensure that it utilized dental professionals with clinical expertise in orthodontics while adjudicating	Health Net will establish an agreement with an Orthodontist, or hire a per diem Orthodontist, to support "same-specialty match" review and	» Contractual Agreement	7/31/2026	4/16/26: DHCS is requesting additional supporting documentation such as revised P&P to ensure decision makers for appeals

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orthodontic appeals as required by D-APL 22-006.	recommended decision. Health Net's Dental Director would finalize the opinion related to appeal decisions.			<p>related to orthodontic services are dental professionals with clinical expertise in treating a member's condition or disease. This CAP remains Open.</p> <p>4.24.26 CA.AG.50 Medi-Cal Dental PP updated. Refer to Pg. 8, #14 – Added language.</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
4.1.1 Quality of Care Grievances Resolution Letters: The Plan's Grievance Resolutions letters did not provide a clear and concise explanation of the decisions.	Health Net updated the relevant policy document to clarify the need for simple plain language in its clear and concise explanation.	<ul style="list-style-type: none"> » HN_4.1.1_4.1.2_CA.AG.50 Medi-Cal_Dental_PP_3.19.26_redline » HN_4.1.1_4.1.2_CA.AG.50 Medi-Cal_Dental_PP_3.19.26_clear 	3/20/2026	<p>4/16/26: DHCS accepts the submitted documentation. DHCS is requesting additional supporting documentation such as examples implementing the new language related to 4.1.1. This CAP remains Open.</p> <p>Refer to Examples of Resolution Letters #1-3 and Closing Comments.</p>
4.1.1 Quality of Care Grievances Resolution Letters: The Plan's Grievance Resolutions letters did not provide	Health Net will provide additional training regarding the	<ul style="list-style-type: none"> » Training Materials » Attendance Tracker 	4/1/2026	4/16/26: DHCS accepts the submitted documentation. DHCS finds that

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<p>a clear and concise explanation of the decisions.</p>	<p>use of appropriate language. Training is scheduled for 3.24.26.</p>			<p>the training materials supports the use of appropriate language. DHCS requests the updated Attendance Tracker to ensure compliance across the team. This CAP remains Open.</p> <p>On 4.2.26 A&G provided the supporting evidence to include training materials and the attendance roster from 3.24.26.</p> <p>4.29.26 Deanna - It doesn't appear that this training roster was submitted. I will</p>

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				<p>submit it with this month's submission.</p> <p>Provided training materials and attendance roster.</p>
<p>4.1.1 Quality of Care Grievances Resolution Letters: The Plan's Grievance Resolutions letters did not provide a clear and concise explanation of the decisions.</p>	<p>Health Net will conduct a targeted audit for 60 days post implementation to validate that letters include language that is clear and concise.</p>	<p>» Audit findings or report</p>	<p>6/1/2026</p>	<p>3/20/26: DHCS requests the updated audit findings post implementation to validate that the findings in 4.1.1 have been corrected, and also example grievance letters that demonstrate clear and concise explanations. This CAP remains Open.</p>

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				<p>4.24.26 On-Track for Audit Findings</p> <p>Refer to Examples of Resolution Letters #1-3 and Closing Comments.</p>
<p>4.1.2 Submission of Discrimination Grievances to DHCS Office of Civil Rights Email Inbox: The Plan did not submit required information to the DHCS OCR discrimination grievance email inbox after mailing Discrimination Grievance Resolution letters to the member.</p>	<p>Health Net made the necessary updates to align with APL requirements. Please refer to policy CA.AG.50 Medi-Cal Dental P&P, Pg. 12-13, Section D.</p>	<ul style="list-style-type: none"> » HN_4.1.1_4.1.2_CA.AG.50 Medi-Cal_Dental_PP_3.19.26_redline » HN_4.1.1_4.1.2_CA.AG.50 Medi-Cal_Dental_PP_3.19.26_clean 	<p>3/15/2026</p>	<p>4/16/26: DHCS accepts the submitted documentation; however, APL 25-006 should be referenced. Please ensure P&P complies with APL 25-006. This CAP remains Open.</p> <p>4.24.26 CA.AG.50 Medi-Cal Dental P&P updated. Refer to Pg. 13, section D: Procedure for</p>

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				<p>handling discrimination issues-added additional language about the Discrimination Grievance Coordinator.</p> <p>Pg.16, Section G – Translation and Alternate Format Selection of Grievance and Appeals Notices – Added language to align with APL 25-006.</p> <p>Section A: General Requirements, Pg. 9, #17 Added language.</p>
4.1.2 Submission of Discrimination Grievances to DHCS Office of Civil Rights Email Inbox: The Plan	Health Net identified the root cause was misclassification of discrimination grievances. Health	<ul style="list-style-type: none"> » HN_4.1.2_Cultural_Linguistic_Training » HN_4.1.2_Grievance_Code_Training 	2/17/2026	4/16/26: DHCS accepts the submitted documentation. DHCS finds that

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<p>did not submit required information to the DHCS OCR discrimination grievance email inbox after mailing Discrimination Grievance Resolution letters to the member.</p>	<p>Net conducted refresher training related to identification and classification of discrimination grievances for A&G staff and management to ensure a clear understanding of requirements. Please refer to the attached 4.1.2 Training documentation.</p>	<ul style="list-style-type: none"> » HN_4.1.2_Training_Roster » HN_4.1.2_Discrimination_Grievance_Desktop_2.9.26 		<p>the training materials support the findings of 4.1.2. DHCS requests the updated Training Roster tracking attendance ensuring that all A&G staff attended, and would like documentation regarding Discrimination Grievance coordinator per APL 25-006. This CAP remains Open.</p> <p>On 4.2.26 A&G provided the supporting evidence to include training materials and the</p>

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				<p>attendance roster from 2.17.26.</p> <p>4.29.26 Per Deanna- This tracker was submitted. I will resubmit the previous materials again.</p> <p>CA.AG.50 Medi-Cal Dental PP. Refer to Pg. 12-13, Section D: Procedure for handling discrimination issues – added language.</p>
<p>4.1.2 Submission of Discrimination Grievances to DHCS Office of Civil Rights Email Inbox: The Plan did not submit required information to the DHCS OCR</p>	<p>Monitoring & Oversight is conducted via various reports:</p> <ul style="list-style-type: none"> » Daily inventory reports are reviewed to ensure 	<ul style="list-style-type: none"> » HN_4.1.2_Discrimination_Cases_Weekly_Reconciliation_Sample » HN_4.1.2_Notification_sent_to_Compliance_Sample » HN_4.1.2_Perceived_Discrimination 	<p>3/20/26</p>	<p>4/16/26: DHCS accepts the submitted documentation. DHCS finds that the oversight steps set in place by reviewing the</p>

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<p>discrimination grievance email inbox after mailing Discrimination Grievance Resolution letters to the member.</p>	<p>cases are properly identified and classified.</p> <ul style="list-style-type: none"> » Daily closed cases discrimination reports are provided to the designated A&G Supervisor to initiate notification to Compliance for DHCS OCR notification. » Weekly reconciliation reports are reviewed by the designated A&G Supervisor that will be shared with the Health & Equity Team to ensure alignment of case classification. 			<p>supporting reports meets the requirements of finding 4.1.2.</p> <p>NFA</p>