

## 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 » CA.AG.50 Medi-Cal Dental PP updated. Refer to Pg. 8, #14 – Added language.	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.	<p>recommended decision. Health Net's Dental Director would finalize the opinion related to appeal decisions.</p> <p>» May 15, 2026 - Plan Update: Appeals &amp; Grievance policy updated per DHCS recommendation.</p>			related to orthodontic services are dental professionals with clinical expertise in treating a member's condition or disease. This CAP remains Open.

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<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>	<ul style="list-style-type: none"> <li>» Health Net updated the relevant policy document to clarify the need for simple plain language in its clear and concise explanation.</li> <li>» May 15, 2026 - Plan Update: Sample letters provided per DHCS request.</li> </ul>	<ul style="list-style-type: none"> <li>» HN_4.1.1_4.1.2_CA.AG.50 Medi-Cal_Dental_PP_3.19.26_redline</li> <li>» HN_4.1.1_4.1.2_CA.AG.50 Medi-Cal_Dental_PP_3.19.26_clean</li> <li>» Refer to Examples of Resolution Letters #1-3 and Closing Comments.</li> </ul>	<p>3/20/2026</p>	<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>4.1.1 Quality of Care Grievances Resolution Letters: The Plan's Grievance Resolutions letters did not provide a clear and concise</p>	<ul style="list-style-type: none"> <li>» Health Net will provide additional training regarding the use of appropriate language. Training</li> </ul>	<ul style="list-style-type: none"> <li>» Training Materials</li> <li>» Attendance Tracker</li> <li>» Refer to the attendance roster "4.1.1 Attendance</li> </ul>	<p>4/1/2026</p>	<p>4/16/26: DHCS accepts the submitted documentation. DHCS finds that the training</p>

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explanation of the decisions.	<p>is scheduled for 3.24.26.</p> <ul style="list-style-type: none"> <li>» May 15, 2026 - Plan Update: Requested documentation is attached per DHCS request.</li> </ul>	DHCS Dental CAP training 3.24.26"		materials supports the use of appropriate language. DHCS requests the updated Attendance Tracker to ensure compliance across the team. This CAP remains Open.
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.	<ul style="list-style-type: none"> <li>» Health Net will conduct a targeted audit for 60 days post implementation to validate that letters include language that is clear and concise.</li> <li>» May 15, 2026 - Plan Update: On-Track for delivery</li> </ul>	<ul style="list-style-type: none"> <li>» Audit findings or report</li> <li>» Refer to Examples of Resolution Letters #1-3 and Closing Comments.</li> </ul>	6/1/2026	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

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	of Audit Findings by June 1, 2026.			explanations. This CAP remains Open.
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.	<ul style="list-style-type: none"> <li>» Health Net made the necessary updates to align with APL requirements. Please refer to policy CA.AG.50 Medi-Cal Dental P&amp;P, Pg. 12-13, Section D.</li> <li>» May 15, 2026 - Plan Update: P&amp;P updates were made as requested by DHCS.</li> </ul>	<ul style="list-style-type: none"> <li>» HN_4.1.1_4.1.2_CA.AG.50 Medi-Cal_Dental_PP_3.19.26_redline</li> <li>» HN_4.1.1_4.1.2_CA.AG.50 Medi-Cal_Dental_PP_3.19.26_clean</li> <li>» CA.AG.50 Medi-Cal Dental: Pg. 13, section D: Procedure for handling discrimination issues- added additional language about the Discrimination Grievance Coordinator. Pg.16, Section G – Translation and Alternate Format Selection of Grievance and Appeals Notices – Added language to align with APL 25-006.</li> </ul>	3/15/2026	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.

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
		Section A: General Requirements, Pg. 9, #17 added additional language.		
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.	» Health Net identified the root cause was misclassification of discrimination grievances. Health 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.	<ul style="list-style-type: none"> <li>» HN_4.1.2_Cultural_Linguistic_Training</li> <li>» HN_4.1.2_Grievance_Code_Training</li> <li>» HN_4.1.2_Training_Roster</li> <li>» HN_4.1.2_Discrimination_Grievance_Desktop_2.9.26</li> <li>» Please refer to "HN 4.1.2 Training Roster" and "4.1.1 Attendance DHCS Dental CAP Training 3.24.26" documents for roster tracking attendance.</li> <li>» CA.AG.50 Medi-Cal Dental PP. Refer to Pg. 12-13, Section D: Procedure for handling discrimination issues – added language.</li> </ul>	2/17/2026	4/16/26: DHCS accepts the submitted documentation. DHCS finds that 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

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<ul style="list-style-type: none"> <li>» May 15, 2026 - Plan Update: Attaching requested information by DHCS.</li> </ul>			CAP remains Open.
<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>Monitoring &amp; Oversight is conducted via various reports:</p> <ul style="list-style-type: none"> <li>» Daily inventory reports are reviewed to ensure cases are properly identified and classified.</li> <li>» Daily closed cases discrimination reports are provided to the designated A&amp;G Supervisor to initiate notification to Compliance for</li> </ul>	<ul style="list-style-type: none"> <li>» HN_4.1.2_Discrimination_Cases_Weekly_Reconciliation_Sample</li> <li>» HN_4.1.2_Notification_sent_to_Compliance_Sample</li> <li>» HN_4.1.2_Perceived_Discrimination</li> </ul>	3/20/26	4/16/26: DHCS accepts the submitted documentation. DHCS finds that the oversight steps set in place by reviewing the supporting reports meets the requirements of finding 4.1.2.

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	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.			

Submitted by: Sally Chow  
 Title: Senior Manager

Signed by: Deanna Eaves, Senior Director, Compliance  
 Date: May 15, 2026