



21281 Burbank Blvd.
Woodland Hills, CA 91367

July 2, 2025

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

Delivered via email

Re: Department of Health Care Services 2024 Health Net of California, Inc., Dental Plan
Audit – Corrective Action Plan Response_July Update

Dear Ms. Durham,

Health Net of California, Inc. ("Health Net" or "the Plan") is responding to the Corrective
Action Plan Response on 6/2/2025 for the final audit finding report dated February 7,
2025.

Attached is the Plan's July update to the audit finding report as requested by the
Department.

Please feel free to contact me via email at Christy.k.bosse@healthnet.com with any
questions. Thank you.

Sincerely,

Christy K. Bosse
Senior Vice President & CA Compliance Officer

Corrective Action Plan Response Form

DMC Plan: Health Net of California, Inc.

Review Period: 4/1/2023 – 3/31/2024

Audit Type: Department of Health Care Services Dental Audit

On-Site Review: 7/22/2024 – 8/2/2024

The Medi-Cal Dental Managed Care (DMC) plan 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 DMC plan must demonstrate that sufficient progress has been made toward implementation of the CAP. In those instances, the DMC plan 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 Department of Health Care Services will maintain close communication with the DMC plan throughout the CAP review process and provide technical assistance as needed.

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
» 4.1.1 Written Explanations in Grievance Resolution Letters – The Plan did not provide clear and concise explanations of the decisions for	» Development of training Medical Directors to provider language that can be inserted into the resolution letters that include	» Training Material (previously submitted) » Dental QOC Training – Attendance report 5-02-25 (previously submitted)	» 5/2/2025	» 5/2/25: DHCS has reviewed and denies the CAP provided from Health Net submitted on April 3, 2025. The CAP submitted is missing supporting

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
members' complaints regarding QOC grievance resolution letters.	<p>reasons for the decision of QOC case reviews.</p> <p>» Note: Examples of resolution language were added to the Desktop Procedure</p>	<p>» Letter Writing Guidelines Desktop Procedure v2</p>	<p>» 7/2/2025</p>	<p>documentation and does not satisfactorily demonstrate Health Net's resolution on providing clear and concise explanations of the decisions for members' complaints regarding QOC grievance resolution letters.</p> <p>» 6/2/25: DHCS has reviewed and denies the CAP provided from Health Net submitted on May 5, 2025. The training PowerPoint submitted does not</p>

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
				include any examples of updated QOC resolution letters or the Dental Director's QOC summary language. Additionally, this change represents a shift in existing process. As such, a revised policy and procedure should be submitted to formally reflect the new workflows.
» 4.1.1 Written Explanations in Grievance Resolution Letters – The Plan did not	» Implementing a focused letter audit for 30 days post training to ensure	» Regulatory BKB audit tool (previously submitted)	» June 2025	» 5/2/25: DHCS has reviewed and denies the CAP provided from Health Net submitted

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
provide clear and concise explanations of the decisions for members' complaints regarding QOC grievance resolution letters.	language in the resolution letter reflects reason for the decision.	» May 2025 DHCS QOC Dental Focused Audit Results	» 7/2/2025	<p>on April 3, 2025. The CAP submitted is missing supporting documentation and does not satisfactorily demonstrate Health Net's resolution on providing clear and concise explanations of the decisions for members' complaints regarding QOC grievance resolution letters.</p> <p>» 6/2/25: DHCS has reviewed and denies the CAP provided from Health Net submitted on May 5,</p>

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
				<p>2025. This tool is intended to support a focused 30-day audit of resolution letters to ensure appropriate language is used that reflects the reasoning for the decision. The CAP will be closed after the audit findings are submitted to and reviewed by DHCS.</p>