

## Corrective Action Plan Response Form

### DMC Plan: Liberty Dental Plan

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	LDP Response 7/29/2025
Liberty did not comply with APL 21-001 in the timely and accurate submission of all discrimination grievances to DHCS and the appropriate remediation of any previously unsubmitted	A memo was issued to the CA Grievance and Appeals Team with the SOP "GA SOP - Anti Discrimination Process", requiring attestation of understanding & immediate implementation.	GA SOP_Memo_Signed Attestations_04.11.2025	Completed 04/11/25	7/1/25: DHCS accepts this documentation.	No further response required.

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discrimination Grievances to make all affected members Whole.					
Liberty did not comply with APL 21-001 in the timely and accurate submission of all discrimination grievances to DHCS and the appropriate remediation of any previously unsubmitted discrimination Grievances to make all affected members Whole.	A training was conducted with the CA G&A team to review the SOP in detail and provide team opportunity to ask questions.	West Coast Team Huddle - Attendance report 4-17-25	Completed 04/17/2025	7/1/25: DHCS accepts this documentation.	No further response required.
Liberty did not comply with APL 21-001 in the timely and accurate submission of all	All grievances with a discrimination allegation component resolved between October 1, 2024 - April	Reporting of Q4 24_Q1 25 DiscrimGriev_DHCS	Completed 04/24/2025	7/1/25: DHCS accepts this documentation for cases that were resolved	LDP emailed all outstanding cases back to May 2021 to the appropriate DHCS mailbox. In

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discrimination grievances to DHCS and the appropriate remediation of any previously unsubmitted discrimination Grievances to make all affected members Whole.	11, 2025 were forwarded to the DHCS OCR's designated discrimination grievance email box (DHCS.DiscriminationGrievances@dhcs.ca.gov).			between 10/1/24-4/11/25. However, DHCS requests documentation confirming that cases prior to 10/1/24 were forwarded to DHCS OCR to make all affected members whole.	total 122 discrimination grievance cases were sent to the DHCS discrimination inbox—113 on July 24, 2025, and 9 on July 28, 2025.
Liberty did not comply with APL 21-001 in the timely and accurate submission of all discrimination grievances to DHCS and the appropriate remediation of any previously unsubmitted discrimination Grievances to make	Oversight procedure to be implemented to ensure all discrimination grievances that are closed the week prior are reviewed by the Lead/Supervisor to confirm timely forward to DHCS.	Weekly Oversight_CA DHCS_DiscriminationCases	Continuous, Started 04/28/25	7/1/25: DHCS accepts this documentation for cases that were resolved between 10/1/24-4/11/25. However, DHCS requests documentation confirming that cases prior to 10/1/24 were	LDP emailed all outstanding cases back to May 2021 to the appropriate DHCS mailbox. In total 122 discrimination grievance cases were sent to the DHCS discrimination inbox—113 on July

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all affected members Whole.				forwarded to DHCS OCR to make all affected members whole.	24, 2025, and 9 on July 28, 2025.
Liberty did not comply with APL 21-001 in the timely and accurate submission of all discrimination grievances to DHCS and the appropriate remediation of any previously unsubmitted discrimination Grievances to make all affected members Whole.	Formal grievance policy for CA Medicaid market to be updated to reference the sop "GA SOP - Anti Discrimination Process".	PENDING; To be provided upon update/approval	Estimated 06/06/2025	7/1/25: DHCS has reviewed and denies CAP provided from Liberty submitted on June 2, 2025. The CAP is missing supporting documentation that has not yet been submitted.	Please see document "01. GA SOP - Anti Discrimination Process" in supporting documents.
Liberty did not comply with APL 21-001 in the timely and accurate submission of all discrimination grievances to DHCS	Grievance training materials for CA Medicaid LOB to be updated to ensure it includes requirements/references to "GA SOP - Anti	PENDING; To be provided upon update	Estimated 06/13/2025	7/1/25: DHCS has reviewed and denies CAP provided from Liberty submitted on June 2, 2025.	Please see the training documents: » "02. GA Memo -Discrimination

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and the appropriate remediation of any previously unsubmitted discrimination Grievances to make all affected members Whole.	Discrimination Process".			The CAP is missing supporting documentation that has not yet been completed and does not satisfactorily demonstrate that all affected members have been made whole.	<p>Grievances_04. 11.2025"</p> <p>» "03. B. Erin_CA DHCS Discrimination Cases"</p> <p>» "04. C. Jessica_Discrimination Grievances_04. 11.2025"</p> <p>» "05. H. Rachel_GA Memo - Discrimination Grievances_04. 11.2025"</p> <p>» "06. S. Gloria_GA Memo - Discrimination Grievances_04. 11.2025"</p> <p>» "07. S. Katrina_GA Memo -</p>

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					<p>Discrimination Grievances_04.11.2025"</p> <p>» "08. V. Cynthia_GA Memo - Discrimination Grievances_04.11.2025"</p> <p>» "09. S. Claribel_GA Memo - Discrimination Grievances_04.11.2025"</p> <p>» "10. CA_Medicaid_Grievance_Resolution_Letter_Requirements_07.02"</p> <p>» "11. Discrimination_Grievance_Procedure_LIBERTY_07.02"</p>

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					» "12. West Coast Team Huddle - Attendance report 4-17-25"
Liberty did not comply with APL 21-001 in the timely and accurate submission of all discrimination grievances to DHCS and the appropriate remediation of any previously unsubmitted discrimination Grievances to make all affected members Whole.	Update to the MIS to includes a reportable field to capture the date the resolution details were forwarded to the DHCS inbox for all discrimination grievances.	PENDING; To be provided upon implementation	Estimated 06/30/2025	7/1/25: DHCS has reviewed and denies the CAP provided from Liberty submitted on June 2, 2025. The CAP is missing supporting documentation that has not yet been completed and does not satisfactorily demonstrate that all affected members have been made whole.	Please see evidence of system enhancement with a reportable field to capture the date the resolution details were forwarded to the DHCS inbox for all discrimination grievances. » See "13. System Enhancement".