

February 2, 2026

VIA EMAIL ONLY

Elisaveta Stefanova
Director, Quality Operations
WelbeHealth Sierra PACE
1224 Scenic Dr.
Modesto, CA 95350

RE: PACE program complaint

Dear Elivaseta Stefanova:

The Department of Health Care Services (DHCS) investigated WelbeHealth Sierra Program of All-Inclusive Care for the Elderly (PACE) based upon a complaint DHCS received on June 2, 2025, regarding participant [REDACTED]. The alleged complaints include the following:

- Delay in addressing participant's medical condition.
- Failure to respond to complainant's concerns before and after her mother's death.
- Lack of communication regarding participant's care.

As a result of this investigation, DHCS has identified PACE programmatic deficiencies which have been noted on the enclosed Corrective Action Plan (CAP). These deficiencies require prompt remediation by WelbeHealth Sierra PACE.

Pursuant to 42 Code of Federal Regulations §460.42, a CAP addressing the deficiencies must be reviewed and approved by DHCS. Please submit a completed CAP to PACECompliance@dhcs.ca.gov within 30 days of the date of this letter.

DHCS would like to thank you for your cooperation during this investigation. We acknowledge your continued efforts towards building relationships with PACE participants and ensuring appropriate care is provided.

If you have any questions or concerns, please contact Joan Morano, Nurse Evaluator, at PACECompliance@dhcs.ca.gov.

Sincerely,

ELECTRONICALLY SIGNED BY

Kevin Phomthevy, Chief
PACE Monitoring and Oversight Unit
Office of Medicare Innovation & Integration
Department of Health Care Services

Enclosure: Corrective Action Plan (CAP)

CC: Elva Alatorre, Chief
PACE Branch
Office of Medicare Innovation & Integration
Department of Health Care Services

Nageena Khan, Chief
PACE Section
Office of Medicare Innovation & Integration
Department of Health Care Services

Erika Origel, Chief
PACE Contracts Management & Processing Unit
Office of Medicare Innovation & Integration
Department of Health Care Services

LaDonna Christensen, Contract Manager
PACE Contracts Management and Processing Unit
Office of Medicare Innovation & Integration
Department of Health Care Services

SIERRA PACE

Corrective Action Plan (CAP)

Program Assurance	Findings	Provider's Plan of Correction
§ 460.98 Service delivery (b) Provision of Services (4) The PACE organization must document, track and monitor the provision of services across all care settings in order to ensure the interdisciplinary team remains alert to the participant's medical, physical, emotional, and social needs regardless of whether services are formally incorporated into the participant's plan of care.	1. PO (PACE Organization) failed to monitor and track the provision of services in the ALF (assisted living facility): • Macrobid ordered on 5/21/25 was started by ALF staff on 5/23/25.	
§ 460.98 Service delivery (c) Timeframes for arranging and providing services (4) Providing approved services. Services must be provided as expeditiously as the participant's health condition requires, taking into account the participant's medical,	2. PO failed to demonstrate that all ordered and approved services were provided as expeditiously as the participant's medical condition required: • Order for urinalysis with culture and sensitivity on	

Program Assurance	Findings	Provider's Plan of Correction
physical, social, and emotional needs.	5/16/25 to rule out possibility of UTI was effectuated on 5/21/25. Macrobid was ordered on 5/21/25 but was started on 5/23/25.	
§ 460.102 Interdisciplinary Team (d) Responsibilities of IDT (1) The IDT is responsible for the following for each participant: (ii) Coordination of Care (C) Ensuring care is implemented as it was ordered, approved, or authorized by the IDT.	3. IDT (inter-disciplinary team) failed to ensure that medical care was implemented as ordered by PCP: Administration of Macrobid by ALF staff was different from PCP order.	
§ 460.102 Interdisciplinary team. (d) Responsibilities of interdisciplinary team. (2) Each team member is responsible for the following: (iii) Documenting changes of a participant's condition in the participant's medical record consistent with	4. PO failed to demonstrate that IDT members documented participant's assessment including vital signs consistent with established policies. Participant was assessed and followed by PCP	

Program Assurance	Findings	Provider's Plan of Correction
documentation policies established by the medical director.	/RN between 5/16 – 5/25/25. Vital signs were only obtained and documented on 5/21/25.	
§ 460.210 Medical Records. (b) Content of medical records. (3) Interdisciplinary assessments, reassessments, plans of care, treatment, and progress notes that include the participants response to treatment.	5. PO failed to demonstrate that medical records contain vital signs relative to a change in participant's change in medical status. Participant presented with change in status from 4/18/25 – 5/25/25 with no consistent documentation of vital signs in medical record.	

September 22, 2026

VIA EMAIL ONLY

Elisaveta Stefanova
Director, Quality Operations
WelbeHealth Sierra PACE
1224 Scenic Dr.
Modesto, CA 95350

Dear Elisaveta Stefanova:

The Department of Health Care Services (DHCS) concluded its review of the Corrective Action Plans (CAPs) submitted by Sierra PACE from June 24, 2026 to August 13, 2026.

After review, it was determined that Sierra PACE did not submit a satisfactory response that adequately addressed the deficiencies listed in the CAP. Due to this failure, as part of the continued monitoring process, DHCS will conduct a targeted review in 6 months to evaluate and validate CAP implementation including Sierra PACE's monthly audit report and compliance. The CAP is attached to this letter for ease and allows Sierra PACE to be used as a reference document.

DHCS appreciates your assistance and commitment in providing quality care and oversight to our PACE participants.

If you have any questions or concerns regarding this letter, please contact Joan Morano, Nurse Evaluator, via PACECompliance@dhcs.ca.gov.

Sincerely,

ELECTRONICALLY SIGNED BY

Elva Alatorre, PACE Branch Chief
Office of Medicare Innovation and Integration
Department of Health Care Services

Elisaveta Stefanova
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September 22, 2026

Enclosure: CAP Grid
CC:

cc: Kevin Phomthevy, PACE Monitoring and Oversight Unit Chief
Office of Medicare Innovation and Integration
Department of Health Care Services

Nageena Khan, PACE Section Chief
Office of Medicare Innovation and Integration
Department of Health Care Services

Erika Origel, PACE Contracts Management & Processing Unit Chief
Office of Medicare Innovation and Integration
Department of Health Care Services

Latsanok (Nokie) Salinthon, PACE Contracts Management and Processing Unit
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