

August 18, 2023

VIA ELECTRONIC MAIL

Access Dental Plan
Bary Bailey, Interim CFO
8890 Cal Center Drive
Sacramento, CA 95826

**RE: RESPONSE TO ACCESS DENTAL PLAN'S CORRECTIVE ACTION PLAN FOR
ENCOUNTER DATA SUBMISSIONS**

Dear Mr. Bary Bailey,

The Department of Health Care Services (DHCS) is writing in response to the Corrective Action Plan (CAP) submitted by Access Dental Plan (ADP) in accordance with contracts 12-89341 (GMC) and 13-90115 (PHP) and Dental All Plan Letter (APL) 13-004.

On June 30, 2023, DHCS issued a Notice of Deficiency (NOD) to ADP in response to the multiple rejected, voided, and duplicate Encounter Data submissions without resolution. ADP provided DHCS with multiple self-reported explanations and future resolution dates regarding deliverables submitted on and after November 10, 2022. Per the July 2023 Encounter Data Deliverable submission, ADP reports all of July's rejections were remediated or resubmitted, and that all months prior to this submission are complete. ADP submitted the CAP to DHCS on July 27, 2023, in response to NOD, however did not reconcile all missing encounter data or provide support to substantiate the representation.

In the recommendation section of the CAP, ADP states that they have updated their claim criteria to provide accurate reporting of denied claim reason codes, and this has **decreased** rejections due to eligibility, invalid codes, and duplicate submissions. As of today's date, ADP has not reconciled all the missing encounter data, nor provided information to support how ADP has fixed the missing encounter data issue.

ADP stated in the CAP response that ADP is utilizing the new EDSRF template to communicate rejections status, and that they are now validating each adjudication cycle to the encounter files created to ensure all claims are sent to DHCS. ADP further submits in the recommendation section of the CAP that they built a robust database for CA specifically and it will help ADP trend rejections and increase acceptance utilization rates. ADP states that this database will aid with timely resubmissions of rejections to

meet Service Level Agreements. There was no discussion how this database actually does what ADP purports and what traceable and verifiable validation controls exist.

On August 18, 2023, at the pre-denial CAP meeting, DHCS discussed the aforementioned and requested the following:

1. The technical documents for the EDSRF validation process. These technical documents should at minimum include the design and testing outcomes as well as documentation in the production environment to support the CAP.
2. The technical documents for the database process. These technical documents should at minimum include the design and testing outcomes as well as documentation in the production environment to support the CAP.
3. A complete reconciliation of the data submittals that was provided to ADP which contain all of the missing data sets to show that all past data issues are now resolved for historical submittals and prospectively.

ADP is to submit to DHCS an updated CAP that addresses the questions above no later September 2, 2023. Should you have any questions regarding this response to ADP's CAP, please email dmcdeliverables@dhcs.ca.gov.

Should you have any questions, please contact me regarding the aforementioned.

Sincerely,

A handwritten signature in blue ink, consisting of several loops and a trailing line.

Adrianna Alcala-Beshara, JD, MBA
Chief, Medi-Cal Dental Services Division
Department of Health Care Services