

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
CALL CENTER "P" FACTOR 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 remarkably high "P" Factor percentage reported in multiple monthly Call Center Deliverables. Prior to that date, ADP provided DHCS with multiple self-reported remediation plans reported on deliverables as early as December 21, 2022. **However as of today's date, ADP has failed to resolve the "P" Factor percentage deficiency.** ADP submitted the CAP to DHCS on July 24, 2023, in response to the NOD.

In the recommendation section of the CAP, ADP states temporary staffing issues have impacted their ability to meet contractually required "P" Factor percentages. ADP also communicates that difficulty sourcing a robust candidate pool of customer service representatives (CSR) has impacted contract compliance. Additionally, ADP identified that due to staffing issues, ADP has increased the use of third-party interpreters which has negatively impacted their Average Handle Time (AHT). To address these issues, ADP reports that ADP plans to recruit 10 bi-lingual CSRs with a target start date of 8/21/23.

The CAP is deficient in several areas. The CAP does not explain how ADP will improve the recruitment process in response to the recruitment issues ADP reports to have experienced to date. In accordance with APL 22-009, ADP is required to provide the

following in a CAP: the deficiency, description of the corrective action, Supporting documentation (such as: documentation of problems in completing the corrective action, evidence of the corrections made, and proof of training), Responsible person(s), and Implementation date(s)

DHCS expects that the following will be included in CAP submittal.

1. Data analysis that supports the actual cause of the P Factor (value) levels – this should include for individual call representatives and use of third-party interpreters;
2. What analysis was shown to support current call representative times and how the updated amount of staffing is sufficient to ensure contract compliance.
3. Supporting documentation on the efforts made for monitoring the P Factor levels and remediating the remarkably high P Factor levels.
4. When does ADP expect these issues to be resolved?

Additionally, ADP stated that meetings, coaching, and trainings will occur outside of normal business hours to avoid pulling resources from phones. The CAP does not explain if a review and enhancement to the call forecasting model is needed nor provide the supporting documentation of the call model itself. Please provide documentation of the trainings that occur and are referenced.

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

Please note, in accordance with APL 22-009, DHCS can require or impose a CAP on a DMC plan and/or impose other enforcement actions for the violations set forth in WIC section 14197.7(a), and others. For example, sanctions can be imposed on a DMC plan together with a CAP, in lieu of a CAP, or if the DMC plan fails to meet CAP requirements. The factor(s) set forth in WIC section 14197.7(g) will be considered by DHCS when determining whether a preceding, concurrent, or subsequent CAP is appropriate when taking enforcement actions, including imposing a sanction.

ADP is to submit to DHCS an updated CAP that addresses the questions above within 10 calendar days, no later than August 28, 2023. Should you have any questions regarding this response to ADP's CAP, please email dmcdeliverables@dhcs.ca.gov.

In your amended response, please be sure to comply with 22-009 requirements. Should you have any additional questions, please contact me regarding the aforementioned.

Sincerely,

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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