



Michelle Baass | Director

February 10, 2026

VIA EMAIL ONLY

Jeremy Martin,
Director of Compliance
InnovAge San Bernardino PACE
410 East Parkcenter Circle North
San Bernardino, CA 92408

RE: PROGRAM OF ALL-INCLUSIVE CARE FOR THE ELDERLY (PACE) PROGRAM COMPLAINT

Dear Jeremy Martin:

The Department of Health Care Services (DHCS) investigated InnovAge San Bernardino Program of All-Inclusive Care for the Elderly (PACE) based upon a complaint DHCS received on July 8, 2024. The complaint alleged issues with the following items regarding participant [REDACTED]:

- Delays in care, such as over three (3) months to have care effectuated
- Numerous orders taking months to be scheduled, including chemotherapy
- Participant was informed to pay out of pocket for skilled nursing facility stay

DHCS' investigation included interviews with the affected participant's representative(s), medical records, specifically focusing on the areas of concern noted by the complainants.

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 InnovAge San Bernardino 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.



Jeremy Martin
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If you have any questions or concerns, please contact Seema Massey, Nurse Evaluator, at PACECompliance@dhcs.ca.gov.

Sincerely,

ELECTRONICALLY SIGNED BY

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

Enclosure: Corrective Action Plan (CAP)

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

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

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

Marina Bishay, Contract Manager
PACE Contracts Management and Processing Unit
Office of Medicare Innovation and Integration
Department of Health Care Services

INNOVAGE – SAN BERNARDINO PACE

Corrective Action Plan (CAP)

Program Assurance	Findings	Provider’s Plan of Correction
<p>42 CFR § 460.98 Service Delivery</p> <p><i>(c) Timeframes for arranging and providing services -</i></p> <p><i>(4) Providing approved services.</i></p> <p>Services must be provided as expeditiously as the participant's health condition requires, taking into account the participant's medical, physical, social, and emotional needs.</p>	<p>1) PACE Organization (PO) was unable to effectuate medical doctor’s (MD) orders, specialist treatment, consultation, and/or referral expeditiously for participant [REDACTED]:</p> <ol style="list-style-type: none"> 1. Abdominal CT 2. Percutaneous endoscopic gastrostomy (PEG) 	



Michelle Baass | Director

April 21, 2026

VIA EMAIL ONLY

Jeremy Martin,
Compliance Director
InnovAge San Bernardino PACE
410 East Parkcenter Circle North
San Bernardino, CA 92408

Dear Jeremy Martin:

The Department of Health Care Services (DHCS) concluded its review of the Corrective Action Plan (CAP) submitted by InnovAge San Bernardino PACE on April 3, 2026. DHCS determined that the submitted document(s) addresses the deficiencies identified in the CAP and satisfies the Program of All-Inclusive Care for the Elderly (PACE) requirements. The CAP is attached to this letter for ease and allows InnovAge San Bernardino PACE to use 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 Seema Massey, Nurse Evaluator, via 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: CAP Grid

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Leith Lombas, Specialist
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