



21281 Burbank Blvd.
Woodland Hills, CA 91367

January 9, 2026

Dana Durham
Chief, Medi-Cal Dental Services Division
Department of Health Care Services

Delivered via email

Re: Notice of Deficiency with Contractual Requirements and Demand for Corrective Action Plan (CAP): Provider Screening, Enrollment and Credentialing, and Interoperability Requirements with impacts to provider directory

Dear Ms. Durham,

Health Net of California, Inc. ("Health Net" or "the Plan") is responding to the Notice of Deficiency and request for Corrective Action Plan dated December 12, 2025.

The Corrective Action Plan along with the referenced supporting documentation is being submitted via email.

Please feel free to contact me via email at Christy.k.bosse@healthnet.com with any questions. Thank you.

Sincerely,

Christy K. Bosse
Senior Vice President & CA Compliance Officer

Corrective Action Plan Response Form

Dental Managed Care Plan: Health Net of California

The Medi-Cal Dental Managed Care plan (Dental MCP) 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 Dental MCP must demonstrate that sufficient progress has been made toward implementation of the CAP. In those instances, the Dental MCP 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 Dental Managed Care Unit of the Department of Health Care Services will maintain close communication with the Dental MCP throughout the CAP review process and provide technical assistance as needed.

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p>Health Net did not comply with Exhibit A14.4 Subsection 5. d.</p> <ul style="list-style-type: none"> » ADA status was not displayed in either the electronic or hard copy provider directories. This was due to the absence of ADA information in 	<p>System Updates:</p> <ul style="list-style-type: none"> » The API was updated to pull ADA details from the source system into the online directory 	<p>System Updates:</p> <ul style="list-style-type: none"> » Attachment A CDN API Screenshots » Attachment B-DQ.HN Online Provider Directory 1.2026 » Attachment C-CA HNET SAC Dec 22 	<p>System Updates:</p> <ul style="list-style-type: none"> » ADA API- 12/10/25 » Online Directories 12/19/25 » PDF of the paper 	

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p>the source system and API's inability to transmit this data to the electronic/hard copy directories.</p> <ul style="list-style-type: none"> » Two additional fields within the provider directory are not displayed: Accepting Pregnant Women and Cultural Competency Indicators. Note: Per DHCS request via email dated 1/29/26 the Plan is adding the corrective action steps for this issue to this CAP response. 	<p>(Attachment A).</p> <ul style="list-style-type: none"> » ADA data was collected from 502 provider locations, entered into the source system, and reflected in online and paper directories 12/22/25 (Attachments B, C, E). » Conducted a complete audit of the provider directories in January 2026. Addition of missing indicators for Accepting Pregnant 	<p>2025 and Attachment C-CA HNET LA-Dec 22 2025</p> <ul style="list-style-type: none"> » Attachment E-GOV CA Network GID Query 12.18.2025 <p>Controls Implemented:</p> <ul style="list-style-type: none"> » Attachment D New Provider Checklist 12.2026 » Attachment D-CA_PE.001_Provider Engagement New Provider Credentialing Process » Attachment D New Provider Policy Timeline Training Attestation 	<p>Directory 12/22/25</p> <ul style="list-style-type: none"> » Indicators for Accepting Pregnant Women and Cultural Competency 2/28/26. <p>Controls Implemented:</p> <ul style="list-style-type: none"> » Provider Checklist and Policy 1/1/2026 » Provider Engagement Training Attestation 1/5/26 » Verification audits performed 	

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>Women and Cultural Competency to be completed by 2/28/26.</p> <p>Controls Implemented:</p> <ul style="list-style-type: none"> » An ADA verification process was added to onsite onboarding visits effective 1/1/2026 (Attachment D). » Contracts are no longer accepted as complete and final without ADA verification; only complete contracts may be accepted 		<p>weekly 1/5/2026</p>	

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>effective 1/1/2026 (Attachment D).</p> <ul style="list-style-type: none"> » Weekly ADA indicator reports will be reviewed for quality control effective 12/19/2025. 			
<p>Health Net did not comply with APL 22-013.</p> <ul style="list-style-type: none"> » The provider directory did not include ADA information because the API failed to transmit the data, and the source system did not consistently capture or maintain it. 	<p>Actions Taken to Address Missing ADA Data:</p> <ul style="list-style-type: none"> » API Update – The API was modified to pull ADA details into the online provider directory (Attachment A). 	<p>API Updates:</p> <ul style="list-style-type: none"> » Attachment A-CDN API Screenshots <p>Source System:</p> <ul style="list-style-type: none"> » Attachment B-DQ.HN Online Provider Directory 1.2026 » Paper Directories Attachment C-CA HN SAC Dec 22 2025 and 	<ul style="list-style-type: none"> » Online Directories- 12/19/25 » PDF provider directory with ADA indicator- 12/22/25 » New Policy effective 1/1/2026 	

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<ul style="list-style-type: none"> » Source System Update – ADA data was collected from 502 provider locations and entered into the source system. On 12/19/2025, the updated data flowed into both online and paper directories (Attachments B, C, E). » Policy & Training – A new policy requiring ADA data collection during enrollment became effective 	<ul style="list-style-type: none"> Attachment C-CA HNET LA – Dec 22 2025 » Indicator in source system Attachment E-GOV CA Network GID Query 12.18.2025 <p>Policy & Training:</p> <ul style="list-style-type: none"> » Attachment D New Provider Checklist 12.2026 » Attachment D CA_PE.001_Provider Engagement New Provider Credentialing Process » Attachment D New Provider Policy Timeline Training Attestation 	<ul style="list-style-type: none"> » New Policy training attestation email 1/5/2026 	

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>1/1/2026, and Provider Engagement staff were trained on 1/5/2026 (Attachment D).</p>			
<p>Health Net did not comply with APL 18-004 and Exhibit A8, Section 9 Provider Network screening, enrollment, credentialing requirements.</p> <ul style="list-style-type: none"> » The plan did not collect ADA information during network enrollment. As a result, the Credentialing team defaulted the ADA indicator in the source system to "No" to maintain data integrity when information was unavailable. 	<p>Actions Taken:</p> <ul style="list-style-type: none"> » Created a new policy requiring ADA information as a mandatory field for all provider contracts. Provider Engagement will collect this data during enrollment, and incomplete contracts will be returned. 	<ul style="list-style-type: none"> » Attachment D New Provider Checklist 12.2026 » Attachment D-CA_PE.001_Provider Engagement New Provider Credentialing Process » Attachment D New Provider Policy Timeline Training Attestation 	<ul style="list-style-type: none"> » New Policy effective 1/1/2026 » New Policy training attestation email 1/5/2026 	

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>Policy effective 1/1/2026 (Attachment D).</p> <ul style="list-style-type: none"> » PE staff completed training on 1/5/2026 (Attachment D). 			
<p>Health Net did not comply with APL 25-010</p> <ul style="list-style-type: none"> » ADA status was not shown in either the electronic or paper provider directories because the source system lacked ADA details and the API did not transmit this data. 	<p>Actions Taken:</p> <ul style="list-style-type: none"> » Policy & Process – Created a new policy requiring ADA information as a mandatory field for all provider contracts. Provider Engagement (PE) collects this data during 	<p>Policy & Process:</p> <ul style="list-style-type: none"> » New Attachment D New Provider Checklist 12.2026 » Attachment D- CA_PE.001_Provider Engagement New Provider Credentialing Process » Attachment D New Provider Policy Timeline Training Attestation 	<p>Policy & Process:</p> <ul style="list-style-type: none"> » Provider Checklist and Policy 1/1/2026 » Provider Engagement Staff trained 1/5/26 <p>System & Directory:</p> <ul style="list-style-type: none"> » ADA- API- 12/10/25 	

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>enrollment, and incomplete contracts are returned. Policy effective 1/1/2026; PE staff trained 1/5/2026 (Attachment D).</p> <ul style="list-style-type: none"> » System & Directory Updates – On 12/10/2025, the API was updated to include ADA status in the online directory. ADA data was collected from 502 provider locations and entered into the source 	<p>System & Directory:</p> <ul style="list-style-type: none"> » API- Attachment A-CDN API Screenshots » Electronic Directories- Attachment B-DQ.HN Online Provider Directory 1.2026 » Paper Directories Attachment C-CA HN SAC Dec 22 2025 and Attachment C-CA HNET LA – Dec 22 2025 » Indicator in source system Attachment E-GOV CA Network GID Query 12.18.2025 	<ul style="list-style-type: none"> » Online Directories- 12/19/25 » PDF of the Paper Directory- 12/22/25 	

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>system on 12/19/2025, enabling updates to online and paper directories. Updated PDFs were provided to the vendor on 12/22/2025 (Attachments A, B, C, E).</p>			

Submitted by: Christy K. Bosse
 Title: Senior Vice President and CA Compliance Officer
 Signed by: Christy K. Bosse
 Date February 2, 2026