

March 19, 2025

*THIS LETTER SENT VIA EMAIL*

Mr. Bary Bailey  
Chief Financial Officer  
Access Dental Plan  
8890 Cal Center Drive  
Sacramento, CA 95826

**2023 ACCESS DENTAL PLAN AUDIT – CORRECTIVE ACTION PLAN**

Dear Mr. Bailey,

The Department of Health Care Services (DHCS) Audits and Investigations Division conducted an on-site audit of Access Dental Plan (Access), a Medi-Cal Dental Managed Care (DMC) plan, from March 18, 2024, through March 29, 2024. The audit covered the review period of November 1, 2022, through October 31, 2023.

On January 16, 2024, DHCS issued a Notice of Deficiency (NOD) to Access in response to the 2023 Access Dental Plan Audit. Access submitted a Corrective Action Plan (CAP) on February 14, 2025, in response to all findings identified in the report within 30 calendar days of the date of this letter.

On the enclosed CAP Response Form, DHCS reviewed and responded to each of the findings. For any CAP that is not closed, please complete the CAP Response Form and submit supporting documentation organized in separate electronic folders that are clearly labeled by corresponding finding number (e.g., 1.1.1, 1.1.2, etc.).

The DMC plan is required to submit a Corrective Action Plan (CAP) in response to all findings identified in the report within 30 calendar days of the date of this letter.

DMC plans are required to complete CAPs within six (6) months of receiving notice of findings from DHCS.

Plans are required to provide a monthly status update to DHCS utilizing the CAP Response Form and provide supporting CAP documentation until the CAP is completed. The DMC plan must demonstrate to DHCS ongoing active progress toward implementation of the CAP within the monthly status update, including key milestones, date(s) of milestone completion, and the expected date of when full compliance will be achieved.

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DHCS will monitor the plan's progress towards full CAP resolution through the monthly status update from the DMC plan until the CAP is closed. The CAP Response Form must be signed by the DMC Plan's Project Representative. The CAP Response Form and corresponding supporting documentation should be submitted to [dmcdeliverables@dhcs.ca.gov](mailto:dmcdeliverables@dhcs.ca.gov).

If you have any questions regarding this notice, please contact DHCS at [dmcdeliverables@dhcs.ca.gov](mailto:dmcdeliverables@dhcs.ca.gov).

Sincerely,

*Original signed by:*

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

Enclosure: CAP Response Form

## Corrective Action Plan Response Form

DMC Plan: Access Dental Plan

Review Period: 11/01/2022 - 10/31/2023

Audit Type: Department of Health Care Services Dental Audit

On-Site Review: 03/18/2024 - 03/29/2024

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

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
1.2.1. Use of Notice of Action of Letter Templates The Plan did not review and update NOA letter templates and "Your Rights" attachments	The templates in use today were updated and operational as of January 2024.  » On February 12, 2025, Avesis sent amples of the updated templates to the State for review. Avesis is	Please see documents:  » 1.2.1_ADG _GMC – Approval  » 1.2.1_ADG _GMC – Delay	January 2024	» 1/16/25: All documents submitted to substantiate this finding are missing the appropriate tag "Delay", "Deny", etc. The Plan will need to update this information

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according to D-APL 22-006.	currently awaiting approval of the revised templates from the State. Upon receiving approval, the implementation of the updated templates is scheduled for production by the end of Q1	<ul style="list-style-type: none"> <li>» 1.2.1_ADP_GMC – Deny</li> <li>» 1.2.1_ADP_LAPHP – Approval</li> <li>» 1.2.1_ADP_LAPHP – Delay</li> <li>» 1.2.1_ADP_LAPHP – Deny</li> </ul> <p>2/14/25: Please see documents:</p> <ul style="list-style-type: none"> <li>» 1.2.1_UM.017.01 Written Notification 12.23.24</li> <li>» 1.2.1_Access_Dental NOA-Deny CA</li> </ul>		<p>according to APL 22-006. In the audit report provided to the Plan, DHCS recommended the development and implementation of a Policies and Procedures (P&amp;P) to ensure compliance using required NOA templates. DHCS did not receive any P&amp;Ps. Please submit P&amp;Ps.</p> <ul style="list-style-type: none"> <li>» 3/19/2025: Access provided the P&amp;P which demonstrates the Plans understanding of providing the proper written notifications to members. The documentation substantiates the resolution of this finding. This CAP is closed, effective</li> </ul>

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
		<ul style="list-style-type: none"> <li>» 1.2.1_Access_Dental NOA-Delay CA</li> </ul>		February 14, 2025. The Plan does not need to provide further documentation for 1.2.1.
1.2.2. Prior Authorization Decision and Notification Timeframes. The Plan did not comply with contractual timeframes for prior authorization (PA) treatment request decisions and notifications.	<ul style="list-style-type: none"> <li>» During the audit review period, the plan experienced significant transformations across leadership, organizational structure, operations, and staffing. These changes adversely impacted the authorization turnaround times, resulting in delays. As of December 2024, the Utilization Management team is meeting turnaround times of authorizations. The</li> </ul>	<p>To be provided January 2025</p> <p>2/14/25: Please see documents:</p> <ul style="list-style-type: none"> <li>» 1.2.2_Dec TAR Report</li> <li>» 1.2.2_UM. 010.01 Prior Authorization Process 7.31.24</li> </ul>	December 2024	<ul style="list-style-type: none"> <li>» 1/16/25: In the audit report provided to the Plan, DHCS recommended that the Plan revise and implement P&amp;Ps to ensure compliance with all contractual timeframes for prior authorization requests. DHCS has not yet received documentation to substantiate that Access is "meeting turnaround times of authorization." DHCS requests documentation showing compliance and P&amp;Ps.</li> </ul>

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	<p>Utilization Management team continues to monitor turnaround times on a consistent basis. A report will be available to provide by the end of January 2025.</p> <p>» 2/14/25: Please see supporting documentation being submitted as evidence of meeting turnaround times of authorization with our December TAR Report. Please also reference policy UM.010.01 Prior Authorization Process document which contains all contractual timeframes for prior</p>			<p>» 3/19/2025: The Plan provided the December TAR report to illustrate the Plans' compliance with contractual timeframes. Additionally, the P&amp;P was provided for review. The documentation substantiates the resolution of this finding. This CAP is closed, effective February 18, 2025. The Plan does not need to provide further documentation for 1.2.2.</p>

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	authorization requests.			
1.2.3. Prior Authorization Decisions. The Plan did not consistently apply its Utilization Review guidelines when adjudicating dental prior authorizations.	<p>» Access Dental regularly conducts inter-rater reliability (IRR) studies for our dental professionals involved in the utilization management (UM) programs by selecting a sample of UM determination files. Independent test results are completed by all professionals for the cases to be evaluated and scored prior to a group meeting. This meeting, led by the Dental Director or their designee, involves a detailed discussion of each case. The group will</p>	<p>Please see document:</p> <p>» 1.2.3_UM.006.01 Inter-Rater Reliability IRR 07.31.24</p> <p>» 1.2.3_2024 IRR Scores</p> <p>2/14/25: Please see documents:</p> <p>» 1.2.3_UM.014.01 Dental Establishment and Review of Clinical Criteria 01.29.25</p>	Q1 2024	<p>» 1/16/25: DHCS determined that the “auto-approval” system led to approvals for services that otherwise should have been denied based on the Plan’s utilization review criteria used by its dental consultants. Please provide a corrective action plan to demonstrate alignment and consistency between the two utilization review systems, should the auto-approval system be used again in the future, consistent with Exhibit A, Attachment 7, Section B</p>

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>identify the criteria from the Medi-Cal Manual of Criteria used to make the final decision. Starting from April 2024, during the CA Monthly Dental Consultants meetings, case reviews were discussed to enhance collaboration and improve IRR.</p> <p>» 2/14/25: During the audit period, ADP made a one-time operational decision to implement an "auto-approval" process for specific procedure codes. This decision was made to ensure that members continued to receive timely access to care. The</p>			<p>Authorization and Review Procedures of the contract.</p> <p>» 3/19/2025: The documentation substantiates the resolution of this finding. This CAP is closed, effective February 14, 2025. The Plan does not need to provide further documentation for 1.2.3.</p>



Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>“auto-approval” has not occurred beyond this one-time exception. On 02/01/2024, ADP migrated to a new platform system for adjudication of all reviews. All clinical determination (decisions) were reviewed by California state licensed dental professionals. Written criteria and guidelines for Utilization Review are based on the dental standard of care and Manual of Criteria which is outlined in the UM.014.01 Dental Establishment and Review of Clinical Criteria Policy and Procedures created</p>			

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	on 05/02/2024, updated 11/25/2024. As of as of 02/01/2024, new denial reasons were implemented with clear and precise reasons for decisions			
3.1.1. Call Center "P" Factor - The Plan did not maintain the required weekly average "P" factor of seven percent or less.	» During the review period, we experienced staffing shortages, increased call volumes and handle times, which were all above and beyond our forecasted model. When multiple issues like this occur at the same time, it makes it extremely challenging to quickly recover through ordinary measures. We implemented	Please see documents: <ul style="list-style-type: none"> <li>» 3.1.1_New Hire Retention Program_9.13.24</li> <li>» 3.1.1_Quarterly ADP Reports</li> </ul>	Q1 2024	» 1/16/25: The documentation substantiates the resolution of this finding. This CAP is closed, effective December 20, 2024. The Plan does not need to provide further documentation for 3.1.1.

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	several initiatives to address our staffing gaps, including a more robust recruitment process, an increased number of cross-trained agents to support call volume fluctuations and the launch of a new employee retention bonus program, these measures collectively have had a positive impact on our overall results.			
4.1.1. Grievance Resolutions - The Plan did not ensure member grievances were completely resolved prior to closing them.	The Access Dental Plan Appeals and Grievances team has taken many steps to address the deficiency above. The goal of the grievance investigation is to ensure we are investigating all aspects of the grievance and providing a resolution to comprehensively close	Please see documents: <ul style="list-style-type: none"> <li>» 4.1.1_Letter Review Process</li> <li>» 4.1.1_476 5331_Res</li> </ul>	October 2023	» 1/16/25: DHCS requests that the Records Request SOP have the Access Dental Plan branding, header, reference documentation, update history, and provide

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>the cases. We have improved our consistency in doing so by:</p> <ul style="list-style-type: none"> <li>» Creating a Language Library that provides more clear and concise resolution language for our members. We are constantly expanding this library to address the most common grievance reasons received.</li> <li>» Implementing a record request SOP that provides strict guidance to the Grievance Coordinators around requests for requests and receipts of records necessary to address aspects of the member</li> </ul>	<p>olution Ltr</p> <ul style="list-style-type: none"> <li>» 4.1.1_478 7644_Resolution Ltr</li> <li>» 4.1.1_10.2 023 Email_Letter Review</li> <li>» 4.1.1_Letter Language Library</li> <li>» 4.1.1_Records Request SOP</li> </ul> <p>2/14/25: Please see documents:</p> <ul style="list-style-type: none"> <li>» 4.1.1_Records Request SOP</li> </ul>		<p>substantiation that Access is meeting contractual compliance with APL 22-006.</p> <ul style="list-style-type: none"> <li>» 3/19/2025: DHCS confirms that the Records Request SOP has been updated. However, Access has not provided substantiation ensuring member grievances are completely resolved prior to closing them. Please provide an audit record of the Grievance personnel review demonstrating that member grievances are completely resolved prior to closure.</li> </ul>

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>grievance. This process requires regular follow-up and brings in Provider Relations and Clinical Support to assist sooner. We found the lack of records was heavily contributing to incomplete resolutions, as seen in this audit. Please see document <i>Records Request SOP</i>.</p> <p>» Letter review process to allow leadership to sign off on member communications and ensure all grievances have been addressed. All member facing communication is required to go through review by</p>	ADP_V2_2112025		

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>the Grievance leadership team. Utilizing a standard checklist, the leadership team reviews the letter to ensure compliance to required templates, confirm language utilized is clear and concise and to review the case file and sign off that all components of the members grievance have been addressed.</p> <p>» 2/14/25: The Records request SOP has been added to an Access Dental template.</p>			
4.1.2. Grievance Resolution	Access Dental Plan has enhanced the daily	Please see document:	Q2 2024	» 1/16/25: In the audit report provided to

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
Timeframe - The Plan did not resolve these grievances within the 30 days from the time of receipt.	<p>oversight by improving the daily inventory report. This has allowed leadership to better identify cases that are nearing the due date and provide assistance in meeting the turnaround times proactively.</p> <p>» 2/14/25: Access Dental Plan has enhanced daily oversight by improving the daily inventory report. This allows leadership and case coordinators the ability to quickly identify cases that are nearing the due date Additionally, the appeals and grievances team has expanded with an additional team lead in place as of 12/1/2024. As an ongoing method of</p>	<p>» 4.1.2_Aug -Sept 2024 Report</p> <p>2/14/25: Please see documents:</p> <p>» 4.1.2_DH CS_6MAU DIT</p> <p>» 4.1.2_GA. 001.01 Grievance and Appeals 05.29.24_ pg 7, 12, 13</p>		<p>the Plan, DHCS recommended that the plan establish and maintain a system of aging grievances that are pending and unresolved for 30 calendar days or more. The document submitted by the Plan did not contain aging grievances, so we are unable to validate if the system is in place. DHCS requests that the Plan submit P&amp;Ps demonstrating how the plan intends to fully resolve grievances within 30 calendar days, an audit of all grievances from the past 6 months demonstrating</p>

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	monitoring and quality assurance, daily team meetings are held to review cases and ensure those nearing due are resolved timely. This method of consistent collaboration ensures accountability and immediate coaching as needed.			<p>resolution time frames, and your plan to ensure this will not occur again.</p> <p>» 3/19/2025: The P&amp;P provided demonstrates contractual requirements and timeframes for grievance resolution. However in attachment 4.1.2 DHCS_6MAUDIT_V2 1 line two (2) indicates a due date (Column M) that is before the QA Received date (Column K). DHCS requests that the Plan update this information with the correct dates.</p>
4.1.3. Grievance Acknowledgement	Access Dental has provided written acknowledgements	Please see document:	Q2 2024	<p>» 1/16/25: DHCS requests that the</p>



Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
Letters - The Plan did not send grievance acknowledgement letters to members within five-calendar days of receipt of the grievance.	<p>consistently within five calendar days of receipt of a grievance.</p> <p>» 2/14/25: Access Dental Plan has enhanced daily oversight by improving the daily inventory report. This allows leadership and case coordinators the ability to quickly identify new cases requiring acknowledgement. Additionally, the appeals and grievances team has expanded with an additional team lead in place as of 12/1/2024. As an ongoing method of monitoring and quality assurance, daily team meetings</p>	<p>» 4.1.3_June 2024 Inventory Report</p> <p>2/14/25: Please see documents:</p> <p>» 4.1.3_GA.001.01 Grievance and Appeals 05.29.24_pg 2</p>		<p>Plan submits P&amp;Ps to ensure that Plan has processes in place to send grievance acknowledgement letters to members within five calendar days of receipt of grievance, an audit of all grievance acknowledgement letters from the past 6 months demonstrating time frames, and your plan to ensure this will not occur again.</p> <p>» 3/19/2025: The documentation substantiates the resolution of this finding. This CAP is closed, effective February 14, 2025. The Plan does not need to provide further</p>

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	are held to review incoming and ongoing case volumes and ensure acknowledgement letters are effectuated timely.			documentation for 4.1.3.
5.1.1. Provider Participation in Potential Quality Issues - The Plan did not involve contracting and community providers records or opinions in the review of Potential Quality Issue (PQI) cases.	The Dental Director along with internal State Dental Directors and participating external providers from the plans network participate in the Peer Review Committee.	Please see document: <ul style="list-style-type: none"> <li>» 5.1.1_ADP Peer Review Comm_Feb 2024</li> <li>» 5.1.1_ADP Peer Review Comm_June 2024</li> <li>» 5.1.1 ADP Peer Review Comm_Aug 2024</li> <li>» 5.1.1QM. 035.01</li> </ul>	February 2024	1/16/25: The documentation substantiates the resolution of this finding. This CAP is closed, effective December 20, 2024. The Plan does not need to provide further documentation for 5.1.1.

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
		Peer Review Committee 01.29.24_draft		
5.2.1. New Provider Training - The Plan did not document whether newly contracted providers completed the mandatory training within ten-business days of activated status.	<p>» Provider Relations plays a key role in fostering strong relationships and ensuring smooth onboarding through active outreach and ongoing training opportunities. Within 10 business days of a new credentialed provider becoming active, Provider Relations initiates a Welcome Call. During this call, the provider relations will confirm that the welcome letter was received, verify provider and office</p>	<p>Please see documents:</p> <ul style="list-style-type: none"> <li>» 5.2.1_Welcome Calls</li> <li>» 5.2.1_ED.03.01_Education Providers_122024_draft</li> </ul> <p>2/14/25: Please documents:</p> <ul style="list-style-type: none"> <li>» 5.2.1_Welcome Calls_Updated</li> </ul>	February 2024	<p>» 1/16/25: The documentation submitted requires updates to the P&amp;P as it does not state that Provider Training will be conducted within 10 business days after the Contractor places a newly contracted provider on active status, pursuant to APL 13-014. Please update P&amp;P to reflect alignment with APL 13-014 and relevant contract citations. Additionally, please update the Welcome Calls Tracker by</p>

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	information, as well as review essential training requirements, guidelines, and resources. All details are carefully tracked using our Welcome Call tracker. Beyond this initial outreach, we continue to engage with the Network by offering regular training opportunities on an adhoc, quarterly and annual basis, ensuring providers have the support they need to render ongoing and quality care to enrollees in compliance with national and market standards. These efforts are consistently	» 5.2.1_ED.0 03.01 Education Providers 02.13.25 draft_pg 4		<p>adding the date when providers were in Active Status, the Turnaround Time in business days, and whether or not the providers completed the training timely.</p> <p>» 3/19/25: The P&amp;P has been updated to specifically state the Provider Training timeframe, however, DHCS requests that Access submit the clean copy of this document. The Welcome calls tracker was updated to include the "committee date" and "TAT". DHCS requests that the Plan update to include whether or not the providers</p>

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>documented and tracked.</p> <p>» 2/14/25: The committee approval date is recognized as the provider's Active date. A provider relations representative will contact the office to schedule and conduct provider education. In Smartsheet, Column M (Welcome call completed) contains a checkbox to indicate when education is complete, which will be marked as TRUE in the Excel sheet. Column W (Date completed) records the education completion date. A field for TAT has been added for the</p>			<p>completed the training timely per contract, and corrective action plan to address providers who received provider training more than 10 days after active enrollment.</p>

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	business day calculation.			
6.2.1. Compliance Officer Reporting Requirements - The Plan's Chief Compliance Officer (CCO) did not report directly to the CEO and the Board of Directors.	Access Dental Plan received a March 13, 2024, Notice of Deficiency from DHCS, section 6.2.1, related to Compliance Officer Reporting Requirements for the audit period of July 1, 2021, through October 31, 2022. Upon receipt Access Dental Plan took steps to shift direct reporting obligation to the CEO. The CCO holds a dual reporting line to the CEO and CLO. We should however note that during the audit period, and through today, Access Dental Plan has always and continues to operate a compliance program with accountability to the Board of Directors through regular ongoing reporting and communication,	Please see document:  » 6.2.1_Compliance Program_Org Chart	April 2024	1/16/25: The Organization chart received shows the Plan's Chief Compliance Officer reports directly to the CEO and Board of Directors. This aligns with the organizational chart submitted to DHCS on June 7, 2024. This CAP is closed, effective December 20, 2024. The Plan does not need to provide further documentation for funding 6.2.1.

Finding/Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	including that of the FWA program.			