

November 24, 2025

*THIS LETTER SENT VIA EMAIL*

Abbie Totten, Chief Executive Officer/Plan President  
Molina Healthcare of California Partner Plan, Inc.  
200 OceanGate, Suite 100  
Long Beach, CA 90802

**FINAL NOTICE OF MONETARY SANCTION FOR FAILURE TO MEET AND EXCEED  
MINIMUM PERFORMANCE LEVELS FOR MEDI-CAL MANAGED CARE  
ACCOUNTABILITY SET PERFORMANCE MEASURES**

Dear Abbie Totten,

The Department of Health Care Services (DHCS) sends this Final Notice of Monetary Sanction Letter to Molina Healthcare of California Partner Plan, Inc. (Molina) for failure to meet and exceed the required minimum performance levels (MPLs) for measurement year 2024 (MY24)<sup>1</sup> Medi-Cal Managed Care Accountability Set (MCAS) performance measures (Managed Care Plan (MCP) Contract, Exhibit A, Attachment 3, section 2.2 Quality Improvement System, subsection 2.2.9 External Quality Review Requirements).

Under California Welfare and Institutions Code (W&I) section 14197.7 and the MCP contract, DHCS has the authority to impose monetary sanctions for Molina's failure to meet and exceed required MPLs for MY24, which has directly impacted Molina's Members (MCP Contract, Exhibit A, Attachment 3, section 2.2 Quality Improvement System, subsection 2.2.9 External Quality Review Requirements). Pursuant to W&I section 14197.7(f) and the MCP contract, DHCS is authorized to impose a \$25,000 sanction per violation of Molina's contractual obligation to meet and exceed MPLs for each MCAS performance measure (MCP Contract, Exhibit E, Program Terms and Conditions, section 1.1.19 Sanctions; W&I section 14197.7(e)).

Successful administration of the Medi-Cal program requires a collaborative partnership between DHCS and Molina. This collaboration includes the expectation that Molina meet their contractual and programmatic requirements on an ongoing basis. DHCS provides Molina with regular opportunities for collaboration on strategies for improving Molina's

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<sup>1</sup> Measurement Year 2024 (MY 24) covered activities conducted from January 1, 2024, to December 31, 2024



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MCAS performance measures required to meet and exceed MPLs, including engaging directly with Molina on required Quality Improvement (QI) work, providing QI coaching, and providing opportunities to participate in statewide and regional quality improvement collaboratives.

On April 25, 2025, DHCS published APL 25-007 Attachment C<sup>2</sup>, which provided MCPs with an overview of the MCAS monetary sanction methodology.

On August 21, 2025, DHCS received Molina's reported MCAS rates through the External Quality Review Organization (EQRO).

On October 7, 2025, DHCS sent Molina the Quality Sanction Bulletin via the Quality Monitoring Inbox, which provided a detailed overview of MCAS monetary sanction methodology for MY24.

DHCS determined that Molina has 37 county-level measures below the MPL across four domain(s), triggering Tier 2 or Tier 3 quality sanctions in three county(ies). See Table 2 for enforcement tier designation triggers.

On October 16, 2025, DHCS notified Molina that DHCS was imposing monetary sanctions in the amount of \$157,000.00 for Molina's failure to comply with its obligations set forth in the contract. See Table 3 and/or 4 for Molina's Sanction Determination Details.

Molina requested a Meet and Confer Conference with DHCS. DHCS and Molina met on October 21, 2025. DHCS also considered the following information provided by Molina in conjunction with the Meet and Confer Conference:

- Molina asked DHCS to consider that the change in coding guidance for DEV-CH was communicated after audited rates were submitted. Molina shared its DEV-CH rates that followed the previous coding guidance.
  - DHCS recognizes that the change in coding guidance for DEV-CH was communicated after audited rates were submitted. Sanction determination was adjusted utilizing Molina's DEV-CH rates that followed the previous coding guidance.

As a result of the information provided by Molina in conjunction with the Meet and Confer Conference, the final sanction amount is **\$104,000.00**, which will be paid to DHCS via ACH/Wire or check payment. Please follow the included payment instructions to

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<sup>2</sup> Department of Health Care Services. Attachment C – Managed Care Accountability Set (MCAS) Monetary Sanction Methodology. APL 25-007, 2025.



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effectuate payment in full to DHCS. Please indicate the name of the MCP, MY, and the reason for payment when submitting your payment to DHCS. The effective date of this sanction is November 24, 2025. Payment for the MCAS MY24 Quality Sanctions is due immediately.

If Molina does not pay within 30 business days, Molina will receive a past due notice. Please provide notice of receipt and payment via email to DHCS' Quality Monitoring inbox at [QualityMonitoring@dhcs.ca.gov](mailto:QualityMonitoring@dhcs.ca.gov). Please include the account number and check number, or wire transfer number, once payment has been sent. Notice of Appeal Rights is included in the letter below.

If you have any questions, send an email to the Quality Monitoring inbox at [QualityMonitoring@dhcs.ca.gov](mailto:QualityMonitoring@dhcs.ca.gov).

Sincerely,

Original signed by

Pamela Riley, MD, MPH  
Assistant Deputy Director, Chief Health Equity Officer  
Quality and Population Health Management  
Department of Health Care Services



Abbie Totten, Chief Executive Officer/Plan President

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ACH/Wire to:

Beneficiary Account Name: Department of Health Care Services

Bank Name: US Bank

Laurel Heights Branch

3471 California St

San Francisco, CA 94118

Routing Number: 122235821

Bank Account Number: 1-583-0005-7623

Reference: Sanction or any identifier

For Check Payment:

Payable to: Department of Health Care Services

Cash Receipts Unit

1501 Capitol Avenue MS 1101

PO Box 997415

Sacramento, CA 95899-7415

For check payment, please include the Final Notice of Monetary Sanction Letter and any backup documents that will identify the payment.



Abbie Totten, Chief Executive Officer/Plan President

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CC

Michelle Baass  
Director  
Department of Health Care Services

Tyler Sadwith  
State Medicaid Director  
Chief Deputy Director, Health Care Programs  
Department of Health Care Services

Lindy Harrington  
Assistant State Medicaid Director  
Department of Health Care Services

Palav Babaria, MD, MHS  
Deputy Director, Chief Quality Officer  
Quality and Population Health Management  
Department of Health Care Services

Judith Recchio  
Deputy Director and Chief Counsel  
Department of Health Care Services

Susan Philip  
Deputy Director, Health Care Delivery Systems  
Department of Health Care Services

Bambi Cisneros  
Assistant Deputy Director, Managed Care  
Health Care Delivery Systems  
Interim Chief, Managed Care Quality and Monitoring Division  
Department of Health Care Services

Michelle Retke  
Contracting Officer, Chief of Managed Care Operating Division  
Health Care Delivery Systems  
Department of Health Care Services

Sayeed Khan, Chief Medical Director  
Molina Healthcare of California Partner Plan, Inc.  
200 Oceangate, Suite 100  
Long Beach, CA 90802

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**Quality and Population Health Management**

1501 Capitol Avenue | MS 0000

P.O. Box 997413

Sacramento, CA 95899-7413

Phone (916) 449-7400 | [www.dhcs.ca.gov](http://www.dhcs.ca.gov)

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Matthew Levin, Vice President, Government Contracts  
Molina Healthcare of California Partner Plan, Inc.  
200 Oceangate, Suite 100  
Long Beach, CA 90802

Diana Sekhon, Director, Government Contracts  
Molina Healthcare of California Partner Plan, Inc.  
200 Oceangate, Suite 100  
Long Beach, CA 90802

James Kyle II, Sr. Medical Director  
Molina Healthcare of California Partner Plan, Inc.  
200 Oceangate, Suite 100  
Long Beach, CA 90802

Amy Park, Chief Financial Officer  
Molina Healthcare of California Partner Plan, Inc.  
200 Oceangate, Suite 100  
Long Beach, CA 90802

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**NOTICE OF APPEAL RIGHTS**

Molina has the right to request a hearing in connection with any sanctions within fifteen (15) working days after the notice of the effective date of sanctions has been given. DHCS will stay the imposition of sanctions upon receipt of the request for a hearing until the effective date of a final decision from the Office of Administrative Hearings and Appeals (OAHA). Molina may request a hearing by sending a letter so stating to the Office of Administrative Hearings and Appeals at the address below:

Chief Administrative Law Judge  
Office of Administrative Hearings and Appeals  
Department of Health Care Services  
3831 N. Freeway Blvd., Suite 200  
Sacramento, CA 95834

A copy of the hearing request must also be sent to:

Angelico Razon  
Quality and Health Equity Measurement Monitoring Section Chief  
Quality and Population Health Management  
Department of Health Care Services  
MS 0020  
P.O. Box 997413  
Sacramento CA 95899-7413

Judith Recchio  
Deputy Director and Chief Counsel  
Office of Legal Services  
Department of Health Care Services  
MS 0010  
P.O. Box 997413  
Sacramento CA 95899-74



**Enclosure**

**TABLE 1: DOMAIN, MEASURE, & ACRONYM**

<b>Domain</b>	<b>Measure</b>	<b>Acronym</b>
<b>Behavioral Health (BH)</b>	Follow-Up After ED Visit for Mental Illness—30 days	FUM
	Follow-Up After ED Visit for Substance Use—30 days	FUA
<b>Children's Health (CH)</b>	Child and Adolescent Well-Care Visits	WCV
	Childhood Immunization Status: Combination 10	CIS-10
	Developmental Screening in the First Three Years of Life	DEV
	Immunizations for Adolescents: Combination 2	IMA-2
	Lead Screening in Children	LSC
	Topical Fluoride for Children	TFL-CH
	Well-Child Visits in the First 30 Months of Life – 0 to 15 Months – Six or More Visits	W30-6+
	Well-Child Visits in the First 30 Months of Life – 15 to 30 Months – Two or More Visits	W30-2+
<b>Reproductive Health and Cancer Prevention (RC)</b>	Chlamydia Screening in Women	CHL
	Prenatal and Postpartum Care: Postpartum Care	PPC-Pst
	Prenatal and Postpartum Care: Timeliness of Prenatal Care	PPC-Pre
	Breast Cancer Screening	BCS-E
	Cervical Cancer Screening	CCS
<b>Chronic Disease Management (CD)</b>	Asthma Medication Ratio	AMR
	Controlling High Blood Pressure	CBP
	Glycemic Status Assessment for Patients with Diabetes (>9%)*	GSD

\*A lower rate is better for this measure.





**TABLE 2: QUALITY ENFORCEMENT TIER DESIGNATION TRIGGERS**

<b>Enforcement Tiers</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
<b>Triggers</b>	One (1) measure below the MPL in any one (1) domain	Two (2) or more measures below the MPL in any one (1) domain	Three (3) or more measures below the MPL in two (2) or more domains
<b>Enforcement Action</b>	Not subject to monetary sanction	Subject to monetary sanction	Subject to monetary sanction



**TABLE 3: MOLINA MY24 MCAS QUALITY SANCTION DETERMINATION DETAILS**

County	Measure	MCP Rate	MPL	Severity Factor	Trending Factor	Population Impacted	HPI Reduction Factor	Sanction per Measure Per County
Riverside	CBP	63.00%	64.48%	1.1	1	1114	20%	\$980.32
Riverside	CCS	46.00%	57.18%	1.6	0.6	7975	20%	\$6,124.80
Riverside	CIS-10	17.00%	27.49%	1.4	1.2	735	20%	\$987.84
Riverside	FUA	33.01%	36.18%	1.2	0.6	280	20%	\$161.28
Riverside	IMA-2	27.00%	34.30%	1.4	1	1146	20%	\$1,283.52
Riverside	LSC	55.00%	63.84%	1.4	0.4	399	20%	\$178.75
Riverside	TFL-CH	18.59%	19.00%	1	0.8	22396	20%	\$14,333.44
Riverside	W30-2	53.83%	69.43%	1.6	0.6	452	20%	\$347.14
Riverside	W30-6	29.66%	60.38%	2	0.4	102	20%	\$65.28
Riverside	WCV	44.42%	51.81%	1.4	0.6	14928	20%	\$10,031.62
San Bernardino	AMR	62.06%	66.24%	1.2	0.4	118	40%	\$33.98
San Bernardino	BCS-E	45.30%	52.68%	1.4	1.4	1811	40%	\$2,129.74
San Bernardino	CBP	61.00%	64.48%	1.2	1.2	1049	40%	\$906.34
San Bernardino	CCS	39.00%	57.18%	1.8	1.2	8639	40%	\$11,196.14
San Bernardino	CIS-10	14.00%	27.49%	1.6	1.2	713	40%	\$821.38
San Bernardino	FUM	49.29%	53.82%	1.2	0.2	215	40%	\$30.96
San Bernardino	GSD	40.00%	33.33%	1.4	0.8	1721	40%	\$1,156.51
San Bernardino	IMA-2	31.00%	34.30%	1.2	0.6	1038	40%	\$448.42
San Bernardino	LSC	40.00%	63.84%	2	1.4	499	40%	\$838.32
San Bernardino	PPC-Post	72.00%	80.23%	1.4	0.8	165	40%	\$110.88
San Bernardino	PPC-Pre	74.00%	84.55%	1.4	1	153	40%	\$128.52

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1501 Capitol Avenue, MS 0020  
P.O. Box 997413  
Sacramento, CA 95899-7413  
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County	Measure	MCP Rate	MPL	Severity Factor	Trending Factor	Population Impacted	HPI Reduction Factor	Sanction per Measure Per County
San Bernardino	TFL-CH	18.49%	19.00%	1	0.8	19877	40%	\$9,540.96
San Bernardino	W30-2	46.83%	69.43%	2	1.2	470	40%	\$676.80
San Bernardino	W30-6	20.92%	60.38%	2	1.2	155	40%	\$223.20
San Bernardino	WCV	41.03%	51.81%	1.4	0.8	13957	40%	\$9,379.10
Sacramento	AMR	65.63%	66.24%	1	0.6	121	10%	\$65.34
Sacramento	BCS-E	47.82%	52.68%	1.2	0.4	1351	10%	\$583.63
Sacramento	CBP	63.00%	64.48%	1.1	0.6	764	10%	\$453.82
Sacramento	CCS	44.00%	57.18%	1.6	1	6529	10%	\$9,401.76
Sacramento	CIS-10	24.00%	27.49%	1.2	1	454	10%	\$490.32
Sacramento	GSD	42.00%	33.33%	1.4	0.8	1575	10%	\$1,587.60
Sacramento	IMA-2	34.00%	34.30%	1	1.2	591	10%	\$638.28
Sacramento	LSC	58.00%	63.84%	1.2	0.6	253	10%	\$163.94
Sacramento	TFL-CH	15.02%	19.00%	1.2	0.8	14809	10%	\$12,794.98
Sacramento	W30-2	62.23%	69.43%	1.4	0.6	207	10%	\$156.49
Sacramento	W30-6	35.10%	60.38%	2	0	159	10%	\$0.00
Sacramento	WCV	49.21%	51.81%	1.1	0.6	8501	10%	\$5,049.59

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**TABLE 4: MOLINA MY24 MCAS QUALITY SANCTION DETERMINATION DETAILS WITH AGGREGATION OF COUNTY-LEVEL RATES WITH SMALL DENOMINATORS USING RATING REGION GROUPINGS**

Aggregated Counties*	Measures	Aggregated Rates	Severity Factor	Population Impacted	HPI Reduction Factor	Sanction Amount
No measures met criteria (i.e., small eligible population) for rate aggregation.						

\*See Table 5 for the detailed Quality Rating Regions and associated counties.

**TABLE 5: QUALITY RATING REGIONS**

Quality Rating Region	Counties
Central California	Mariposa, Merced, Monterey, Santa Cruz
Central Coast	San Luis Obispo, Santa Barbara
Inland Empire	Riverside, San Bernardino
North Bay	Marin, Napa, Solano, Sonoma, Yolo
Rural Central	Alpine, El Dorado
Rural North	Del Norte, Humboldt, Lake, Lassen, Mendocino, Modoc, Shasta, Siskiyou, Trinity
Rural South	Amador, Calaveras, Inyo, Mono, Tuolumne
Rural Upper Central	Butte, Colusa, Glenn, Nevada, Placer, Plumas, Sierra, Sutter, Tehama, Yuba
San Joaquin Valley	San Joaquin, Stanislaus
Tri County	Fresno, Kings, Madera
Alameda	Alameda
Contra Costa	Contra Costa
Imperial	Imperial
Kern	Kern
Los Angeles	Los Angeles

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Quality Rating Region	Counties
Orange	Orange
Sacramento	Sacramento
San Benito	San Benito
San Diego	San Diego
San Francisco	San Francisco
San Mateo	San Mateo
Santa Clara	Santa Clara
Tulare	Tulare
Ventura	Ventura

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