

January 13, 2026

VIA EMAIL ONLY

Jeremy Martin
Director of Compliance (CA & NM)
InnovAge Corporate Headquarters
Denver, CO 80230

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

Dear Jeremy Martin:

The Department of Health Care Services (DHCS) investigated InnovAge Crenshaw Program of All-Inclusive Care for the Elderly (PACE) based upon a complaint DHCS received on April 29, 2025. The complaint alleged:

- PO's contracted facility Gentle Sisters LLC has a questionable side agreement with PACE participant [REDACTED]
- Gentle Sisters LLC rendered services to the participant that were not authorized, not part of the participant's PACE care plan, and not deemed necessary by the PO.
- Participant was billed by Gentle Sisters LLC for services provided during December 2024 & January – February 2025 while enrolled in the PACE program.

DHCS is in receipt of InnovAge Crenshaw PACE's response emails and documents throughout the investigation. After reviewing the relevant facts, documents, and responses, DHCS is unable to substantiate the concerns raised by the complainant.

DHCS reserves the right to conduct announced or unannounced visits with InnovAge Crenshaw PACE in the future to ensure further compliance with the PACE Program.

Jeremy Martin
Page 2
January 13, 2026

DHCS would like to thank you and your team for your assistance and cooperation during this investigation. If you have any questions, please contact Kevin Phomthevy, Health Program Manager, at PACECompliance@dhcs.ca.gov.

Sincerely,

ELECTRONICALLY SIGNED BY

Elva Alatorre, Chief
PACE Branch
Integrated Systems of Care Division
Department of Health Care Services

cc: Kevin Phomthevy, Chief
PACE Monitoring and Oversight Section
Integrated Systems of Care Division
Department of Health Care Services

Nageena Khan, Chief
PACE Section
Integrated Systems of Care Division
Department of Health Care Services

Erika Origel, Chief
PACE Contracts Management & Processing Unit
Integrated Systems of Care Division
Department of Health Care Services

Marina Bishay, Contract Manager
PACE Contracts Management and Processing Unit
Integrated Systems of Care Division
Department of Health Care Services