

# CORRECTIVE ACTION PLAN RESPONSE FORM



**DMC Plan:** Health Net of California, Inc.

**Audit Type:** Department of Health Care Services Dental Audit

**Review Period:** 4/1/2021 – 3/31/2022

**On-Site Review:** 3/21/2022 – 4/1/2022

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 Dental Managed Care Unit of 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.

## 1. Utilization Management

Finding Number and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p><b>1.3.1 Appeal Procedures</b></p> <p>The Plan did not utilize the DHCS Notice of Appeal (NAR) template for</p>	<p>Health Net has taken the following steps to correct this deficiency:</p> <ul style="list-style-type: none"> <li>» Health Net A&amp;G updated NAR templates to include</li> </ul>	<ul style="list-style-type: none"> <li>» Policy and Procedures – Member Appeals and Grievances</li> </ul>		



Finding Number and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p>appeals that are overturned or upheld.</p>	<p>“Overturn” and “Upheld” per DHCS templates.</p> <ul style="list-style-type: none"> <li>» Health Net updated the existing Policies and Procedures to reflect the changes to the new protocol. Liberty’s denial rationales were replaced with Health Net specific denial rationales.</li> </ul>	<ul style="list-style-type: none"> <li>» LA County Dental NAR Overturn Template</li> <li>» LA County Dental NAR Uphold Template</li> <li>» Sacramento County Dental NAR Overturn Template</li> <li>» Sacramento County Dental NAR Uphold Template</li> </ul>		
<p><b>1.3.2 Notice of Appeal Resolution (NAR)</b></p> <p>The NARs did not contain relevant information in the explanation of the Plan’s decision.</p>	<p>Health Net has taken the following steps to correct this deficiency:</p> <ul style="list-style-type: none"> <li>» Health Net created a denial rationale master excel file specific for Health Net’s Dental Managed Care</li> </ul>	<ul style="list-style-type: none"> <li>» Denial Rationales</li> <li>» DHCS Medi-Cal Dental CAP Refresher Training</li> <li>» DHCS Medi-Cal Dental CAP Refresher Training –</li> </ul>		

Finding Number and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>Program's line of business.</p> <ul style="list-style-type: none"> <li>» Health Net A&amp;G completed refresher training on denial rationales.</li> <li>» Health Net prepared a calendar timeline to plan what type of oversight/monitoring will be used to ensure letters are compliant.</li> <li>» Health Net communicated the changes with Director of Quality at Liberty to determine a deployment date in 2023.</li> </ul>	<p>Attendance Report</p> <ul style="list-style-type: none"> <li>» Performance Monitoring of Member Letters</li> <li>» 2023 Liberty Validation Audit</li> </ul>		

## 2. Case Management and Coordination of Care

Finding Number and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p><b>2.1.1 Initial Health Screening</b></p> <p>The Plan did not ensure that all new members received initial health assessments within 90 days of enrollment.</p>	<p>Health Net has taken the following steps to correct this deficiency:</p> <ul style="list-style-type: none"> <li>» Health Net updated the Initial Oral Health Assessment Standard Operating Procedure. Policy was approved by DHCS on 3/8/2023.</li> <li>» Health Net reviewed and updated the Oral Health Information Form. Form was approved by DHCS on 3/8/2023.</li> </ul>	<ul style="list-style-type: none"> <li>» Approved Standard Operating Procedure – Initial Health Information Process</li> <li>» Health Net sample GMC welcome packet</li> <li>» Q2 2023 Quarterly reporting – Initial Oral Health Risk Assessment Report</li> </ul>		

Finding Number and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<ul style="list-style-type: none"> <li>» Health Net updated the New Member Welcome Package to include the initial Oral Health Assessment form.</li> <li>» Health Net revised the quarterly reporting to ensure follow-up and outreach to members if an OHRA form is not received.</li> </ul>			
<p><b>2.1.2 Initial Health Screening Changes</b></p> <p>The Plan did not report changes to their initial screening policy to DHCS within</p>	<p>Health Net has taken the following steps to correct this deficiency:</p> <ul style="list-style-type: none"> <li>» Health Net updated the Initial Oral Health Information</li> </ul>	<ul style="list-style-type: none"> <li>» Approved Standard Operating Procedure – Initial Health Information Process</li> </ul>		

Finding Number and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p>ten calendar days of any changes, and annually no later than 30 days after the first day of every calendar year.</p>	<p>Process Standard Operating Procedure to include steps to submit any revisions to the policy to DHCS within 10 days and annually no later than 30 days after the first day of every calendar year</p> <p>» Health Net updated its internal process with an annual Dental Deliverable to submit Initial Oral Health Assessment Forms &amp; Policies no later than 30 days after the</p>	<p>» Internal deliverable confirmation</p>		

Finding Number and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	first of every calendar year.			
<p><b>2.2.1 Special Health Care Needs (SHCN) and Children with Special Health Care Needs (CSHCN)</b></p> <p>The Plan did not implement mechanisms to identify, assess and treat members with SHCN or CSHCN.</p>	<p>Health Net has taken the following steps to correct this deficiency:</p> <ul style="list-style-type: none"> <li>» Updated Initial Oral Health Assessment Forms and submitted to DHCS for approval.</li> <li>» Updated Policies to outline the following: <ul style="list-style-type: none"> <li>○ How the Plan identifies members with special needs</li> <li>○ How the Plan assesses</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>» Oral Health Assessment Forms (adult and children)</li> <li>» Approved Standard Operating Procedure: CA Outreach Process for C/SHCN and LTC Members</li> <li>» Approved Standard Operating Procedure: Oral Health Information Process</li> <li>» Policies and Procedures: Coordination of Dental Services</li> </ul>		

Finding Number and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<ul style="list-style-type: none"> <li>and treats members</li> <li>○ Workplan a full circle from identifying members to treatments</li> </ul>			

## 4. Member's Rights

Finding Number and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p><b>4.1.1 Grievance Resolution Decision</b></p> <p>The Plan's QOC resolution letters did not contain a clear and concise explanation of the Plan's decision.</p>	<ul style="list-style-type: none"> <li>» The Plan updated QOC Dental letter templates.</li> <li>» The Plan provided training to staff that included processes and procedures to ensure that QOC</li> </ul>	<ul style="list-style-type: none"> <li>» Slide Deck of training</li> <li>» Grievance Quality of Care QOC Dental</li> </ul>		

Finding Number and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>resolution letters contain clear and concise explanation of the Plan's decision.</p> <ul style="list-style-type: none"> <li>» The Plan audits all A&amp;G cases for Final Letter Resolution monthly.</li> </ul>			

## 5. Quality Management

Finding Number and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p><b>5.3.1 Provider Training Time Frame</b></p> <p>The Plan did not ensure newly contracted providers received training within ten business</p>	<p>Health Net has taken the following steps to correct this deficiency:</p> <ul style="list-style-type: none"> <li>» Health Net updated policies and procedure to outline the following:</li> </ul>	<ul style="list-style-type: none"> <li>» Policies and Procedure – Provider Orientations</li> <li>» Attestation of new provider form</li> </ul>		

Finding Number and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p>days of being placed on active status.</p>	<ul style="list-style-type: none"> <li>○ Newly contracted providers received training within ten business days of being placed on active status. Attestation process.</li> <li>○ How the Plan will perform follow-up procedures with the providers who did not attend the provider training.</li> </ul>	<ul style="list-style-type: none"> <li>» Network Activity Report</li> </ul>		

Finding Number and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	» Revised quarterly reporting.			

**Submitted by: Christy K. Bosse**

**Title: Senior Vice President & CA Compliance Officer**

**Date: 4/12/2024**