

Michelle Baass | Director

November 21, 2025

VIA EMAIL ONLY

Jonathan Chau
Director of Regulatory Affairs & Compliance
On Lok PACE
1333 Bush St.
San Francisco, CA 94109
RE: PACE program complaint

Dear Jonathan Chau:

The Department of Health Care Services (DHCS) investigated On Lok Program of All-Inclusive Care for the Elderly (PACE) based upon a complaint DHCS received on August 5, 2025, regarding participant [REDACTED]. The alleged complaint includes the following:

- Fracture, bruising and binding marks of unknown etiology (Fremont Village).
- Coordination of care post discharge including SNF placement.
- Lack of physical rehabilitation support results in a decline in mobility.
- Lack of appropriate supervision results in safety risks.
 - Supplies left at bedside posed safety risk.
 - Disregard for the family's safety requests of 1 caregiver per 2 residents in her room.
- Phlebotomy error in SNF (Creekside)
 - Failure to establish identification prior to blood draw.
 - Blood drawn on participant in error.
- Meals and basic needs (feeding, toileting) are not being met by the facility. Needs are being attended to by the family during visits (Creekside SNF).
- "On Lok pressured us to withdraw from their insurance plan."
- False Advertising

As a result of this investigation, DHCS has identified PACE programmatic deficiencies which have been noted on the enclosed Corrective Action Plan (CAP). These deficiencies require prompt remediation by On Lok PACE PACE.

Pursuant to 42 Code of Federal Regulations §460.42, a CAP addressing the deficiencies must be reviewed and approved by DHCS. Please submit a completed CAP to PACECompliance@dhcs.ca.gov within 30 days of the date of this letter.

Jonathan Chau
Page 2
November 21, 2025

DHCS would like to thank you for your cooperation during this investigation. We acknowledge your continued efforts towards building relationships with PACE participants and ensuring appropriate care is provided.

If you have any questions or concerns, please contact Joan Morano, Nurse Evaluator, at PACECompliance@dhcs.ca.gov.

Sincerely,

ELECTRONICALLY SIGNED BY

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

Enclosure: Corrective Action Plan (CAP)

cc: Elva Alatorre, Chief
PACE Branch
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

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

ON LOK PACE

Corrective Action Plan (CAP)

| Program Assurance | Findings | Provider's Plan of Correction |
|---|--|-------------------------------|
| <p>§ 460.71 Oversight of direct participant care.</p> <p>(a) The PACE organization must ensure that all employees and contracted staff furnishing care directly to participants demonstrate the skills necessary for performance of their position.</p> <p>(2) The PACE organization must develop a competency evaluation program that identifies those skills, knowledge, and abilities that must be demonstrated by direct participant care staff (employees and contractors).</p> | <p>PACE Organization (PO) failed to ensure that contracted staff demonstrated skills to perform accurate phlebotomy for:</p> <p>Participant █ – mistaken lab draws on 6/4/24, 7/11/25.</p> | |



Michelle Baass | Director

February 3, 2026

VIA EMAIL ONLY

Jonathan Chau
Director of Regulatory Affairs & Compliance
On Lok PACE
1333 Bush St.
San Francisco, CA 94109

RE: PACE program complaint

Dear Jonathan Chau:

The Department of Health Care Services (DHCS) concluded its review of the Corrective Action Plan (CAP) submitted by On Lok Program of All-Inclusive Care for the Elderly (PACE) on December 23, 2025. DHCS determined that the submitted document(s) addresses the deficiencies identified in the CAP and satisfies PACE requirements. The CAP is attached to this letter for ease and allows On Lok PACE to use as a reference document.

DHCS appreciates your assistance and commitment in providing quality care and oversight to our PACE participants.

If you have any questions or concerns regarding this letter, please contact Joan Morano, Nurse Evaluator, via PACECompliance@dhcs.ca.gov.

Sincerely,

ELECTRONICALLY SIGNED BY

Kevin Phomthevy, Chief
PACE Monitoring and Oversight Unit
Office of Medicare Innovation & Integration
Department of Health Care Services

Enclosure: CAP Grid

cc: Next page

Jonathan Chau
Page 2
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