

April 29, 2025

VIA EMAIL ONLY

Celeste Cueva, Compliance Manager
St. Paul's PACE
111 Elm Street
San Diego, CA 92101

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

Dear Celeste Cueva:

The Department of Health Care Services (DHCS) investigated St. Paul's Program of All-Inclusive Care for the Elderly (PACE) based upon a complaint DHCS received on September 8, 2024. The complaint alleged issues with the following items regarding a St. Paul's PACE participant:

- Poor communication between staff and participant regarding transportation
- Unacceptable behavior and negligence from staff

DHCS' investigation included communication with the affected participant's representative(s), medical records, specifically focusing on the areas of concern noted by the complainants.

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 St. Paul's PACE.

Pursuant to 42 Code of Federal Regulations §460.194 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. 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.

Celeste Cueva
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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

Andrew Lausmann, Chief
PACE Policy Unit
Integrated Systems of Care Division
Department of Health Care Services

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

ST. PAUL'S PACE

Corrective Action Plan (CAP)

Program Assurance	Findings	Provider's Plan of Correction
<p>§ 460.76 Transportation services.</p> <p>(e) Changes in care plan. As part of the interdisciplinary team process, PACE organization staff (employees and contractors) must communicate relevant changes in a participant's care plan to transportation personnel.</p>	<p>1). The interdisciplinary team (IDT) was unable to communicate changes in the participant's appointments to transportation services.</p> <ul style="list-style-type: none">Participant was picked up for an appointment on 10/1/24 but there was no appointment due to medication being discontinued. Transportation was not notified of the change; appointment was not cancelled on the list.	

Program Assurance	Findings	Provider's Plan of Correction
<p>§ 460.102 Interdisciplinary team.</p> <p>(f) Exchange of information between team members. The PACE organization must establish, implement, and maintain documented internal procedures governing the exchange of information between team members, contractors, and participants and their caregivers consistent with the requirements for confidentiality in § 460.200(e).</p>	<p>2). PACE organization (PO) was unable to ensure that pertinent information regarding the participant's care is being communicated with, and between the participant and the team members.</p> <ul style="list-style-type: none"> • Participant and complainant calls and messages for IDT members were never responded to. • PO acknowledged that some of the messages may not have been relayed by the staff member, and staff turnover may have contributed to the breakdown in communication. 	

August 18, 2025

VIA EMAIL ONLY

Celeste Cueva, Compliance Manager
St. Paul's PACE
111 Elm Street
San Diego, CA 92101

Dear Celeste Cueva:

The Department of Health Care Services (DHCS) concluded its review of the Corrective Action Plan (CAP) submitted by St. Paul's PACE on August 1, 2025. DHCS determined that the submitted document(s) addresses the deficiencies identified in the CAP and satisfies the Program of All-Inclusive Care for the Elderly (PACE) requirements. The CAP is attached to this letter for ease and allows St. Paul's PACE to be used 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

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

Enclosure: CAP Grid

cc: See Next Page

Celeste Cueva
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