



21281 Burbank Blvd.
Woodland Hills, CA 91367

March 20, 2026

Dana Durham, Chief Medi-Cal Dental Services Division
Department of Health Care Services

Delivered via email

Re: Department of Health Care Services 2025 Dental Audit CAP Request of
Health Net Community Solutions, Inc.

Dear Ms. Durham,

Health Net Community Solutions, Inc. ("Health Net" or "the Plan") is responding to the final audit report and request for Corrective Action Plan dated February 20, 2026.

The Corrective Action Plan along with the referenced supporting documentation is being submitted via email to dmcdeliverables@dhcs.ca.gov as requested.

Please feel free to contact me via email at Christy.k.bosse@healthnet.com with any questions. Thank you.

Sincerely,

Christy K. Bosse
Senior Vice President & CA Compliance Officer

Corrective Action Plan Response Form

DMC Plan: Health Net Community Solutions, Inc.

Review Period: 4/1/2024-12/31/2024

Audit Type: Department of Health Care Services Dental Audit

On-Site Review: 9/2/2025-9/12/2025

The Medi-Cal Dental Managed Care plan (Dental MCP) 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 Dental MCP must demonstrate that sufficient progress has been made toward implementation of the CAP. In those instances, the Dental MCP 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 Dental MCP throughout the CAP review process and provide technical assistance as needed.

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
1.3.1 Prior Authorization Appeals: The Plan did not ensure that it utilized dental professionals with clinical expertise in orthodontics while adjudicating	» Health Net will establish an agreement with an Orthodontist, or hire a per diem Orthodontist, to support "same-specialty match" review and recommended decision. Health Net's Dental Director would	» Contractual Agreement	» 7/31/2026	

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
orthodontic appeals as required by D-APL 22-006.	finalize the opinion related to appeal decisions.			
4.1.1 Quality of Care Grievances Resolution Letters: The Plan's Grievance Resolutions letters did not provide a clear and concise explanation of the decisions.	<ul style="list-style-type: none"> » Health Net updated the relevant policy document to clarify the need for simple plain language in its clear and concise explanation. 	<ul style="list-style-type: none"> » HN_4.1.1_4.1.2_CA.AG.50_Medi-Cal_Dental_PP_3.19.26_redline » HN_4.1.1_4.1.2_CA.AG.50_Medi-Cal_Dental_PP_3.19.26_clean 	<ul style="list-style-type: none"> » 3/20/2026 	
4.1.1 Quality of Care Grievances Resolution Letters: The Plan's Grievance Resolutions letters did not provide a clear and concise explanation of the decisions.	<ul style="list-style-type: none"> » Health Net will provide additional training regarding the use of appropriate language. » Training is scheduled for 3.24.26. 	<ul style="list-style-type: none"> » Training Materials » Attendance Tracker 	<ul style="list-style-type: none"> » 4/1/2026 	
4.1.1 Quality of Care Grievances Resolution Letters: The Plan's	<ul style="list-style-type: none"> » Health Net will conduct a targeted audit for 60 days post 	<ul style="list-style-type: none"> » Audit findings or report 	<ul style="list-style-type: none"> » 6/1/2026 	

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
Grievance Resolutions letters did not provide a clear and concise explanation of the decisions.	implementation to validate that letters include language that is clear and concise.			
4.1.2 Submission of Discrimination Grievances to DHCS Office of Civil Rights Email Inbox: The Plan did not submit required information to the DHCS OCR discrimination grievance email inbox after mailing Discrimination Grievance Resolution letters to the member.	» Health Net made the necessary updates to align with APL requirements. Please refer to policy CA.AG.50 Medi-Cal Dental P&P, Pg. 12-13, Section D.	<ul style="list-style-type: none"> » HN_4.1.1_4.1.2_CA.AG.50_Medi-Cal_Dental_PP_3.19.26_redline » HN_4.1.1_4.1.2_CA.AG.50_Medi-Cal_Dental_PP_3.19.26_clean 	» 3/15/2026	
4.1.2 Submission of Discrimination Grievances to DHCS Office of Civil Rights Email Inbox: The Plan did not submit required information	» Health Net identified the root cause was misclassification of discrimination grievances. Health Net conducted refresher training related to	<ul style="list-style-type: none"> » HN_4.1.2_Cultural_Linguistic_Training » HN_4.1.2_Grievance_Code_Training 	» 2/17/2026	

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
to the DHCS OCR discrimination grievance email inbox after mailing Discrimination Grievance Resolution letters to the member.	identification and classification of discrimination grievances for A&G staff and management to ensure a clear understanding of requirements. Please refer to the attached 4.1.2 Training documentation.	<ul style="list-style-type: none"> » HN_4.1.2_Training_Roster » HN_4.1.2_Discrimination_Grievance_Deskop_2.9.26 		
4.1.2 Submission of Discrimination Grievances to DHCS Office of Civil Rights Email Inbox: The Plan did not submit required information to the DHCS OCR discrimination grievance email inbox after mailing Discrimination Grievance Resolution letters to the member.	<p>Monitoring & Oversight is conducted via various reports:</p> <ul style="list-style-type: none"> » Daily inventory reports are reviewed to ensure cases are properly identified and classified. » Daily closed cases discrimination reports are provided to the designated A&G Supervisor to initiate notification to Compliance for DHCS OCR notification. 	<ul style="list-style-type: none"> » HN_4.1.2_Discrimination_Cases_Weekly_Reconciliation_Sample » HN_4.1.2_Notification_sent_to_Compliance_Sample » HN_4.1.2_Perceived_Discrimination 	» 3/20/26	

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<ul style="list-style-type: none"> » Weekly reconciliation reports are reviewed by the designated A&G Supervisor that will be shared with the Health & Equity Team to ensure alignment of case classification. 			

Submitted by: Deanna Eaves
 Title: Senior Director, Compliance

Signed by: Christy Bosse, Sr. Vice President & Compliance Officer
 Date: March 20, 2026