CALIFORNIA DEPARTMENT OF HEALTH CARE SERVICES
Michelle Baass | Director

November 10, 2026

THIS LETTER SENT VIA EMAIL

Steve Sohn
Chief Administrative Officer
Liberty Dental Plan
1730 Flight Way Suite 125
Tustin, CA 92782

2025 LIBERTY DENTAL PLAN AUDIT – CORRECTIVE ACTION PLAN RESPONSE

Dear Mr. Sohn:

The Department of Health Care Services (DHCS) conducted an on-site audit of Liberty Dental Plan (Liberty) on February 17, 2026 through February 27, 2026, covering the period of July 1, 2024 through June 30, 2025. On September 10, 2026, DHCS sent Liberty the Audit findings, and a request for a Corrective Action Plan (CAP). On October 12, 2026, Liberty submitted their CAP response to DHCS.

DHCS has reviewed and has confirmed that Liberty has provided sufficient evidence that refutes the finding for 1.2.1. DHCS does find that providing appropriate documentation and evidence should have occurred during the exit process before the report was made final. In the future, DHCS expects that Liberty will dispute any findings when the opportunity to dispute is provided. This CAP is closed effective October 12, 2026. DHCS will continue to monitor Liberty's compliance with the Dental MC contract, Dental All Plan Letters, and federal and state regulations. If you have any questions regarding this notice, please contact DHCS at dmcdeliverables@dhcs.ca.gov.

Sincerely,

Original signed by

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

Enclosure: CAP Response Form

Corrective Action Plan Response Form

DMC Plan: Liberty Dental Plan **Review Period:** 7/1/2024-6/30/2025

Audit Type: Department of Health Care Services Dental Audit **On-Site Review:** 2/17/2026-2/27/2026

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. 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
1.2.1 Prior Authorization Decision Maker Identification: The Plan did not ensure that the name of the decision maker listed on the NOA letter matched the name of the decision maker	The provider identified in the correspondence and the provider reflected in the underlying system records were the same individual. An abbreviated naming convention used during the initial configuration of the correspondence-generation logic caused the Clinical Reviewer's	Please see "CA Mbr Ltr DDS Name-Evidence.pdf". Please see "CA PA determined by Dr. Tran – System Evidence".	5/29/2026	11/10/26: Liberty has provided sufficient evidence that refutes the finding for 1.2.1. DHCS does find that providing appropriate

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
listed in the Plan's adjudication system.	name to appear differently in certain communications. Liberty corrected the configuration and completed validation testing to confirm consistent display of the reviewer's name across member and provider correspondence.			documentation and evidence should have occurred during the exit process before the report was made final. In the future, DHCS expects that Liberty will dispute any findings when the opportunity to dispute is provided.
4.1.1 Discrimination Grievance Reporting: The Plan did not submit the required information to the	N/A	N/A	N/A	This CAP was closed effective 3/20/26. No additional documentation is needed.

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
DHCS OCR' discrimination grievance email inbox within the required ten calendar days after mailing a Discrimination Grievance Resolution letter to the member.				