

April 9, 2026

*THIS LETTER SENT VIA EMAIL*

Ms. Christy Bosse  
Senior Vice President & CA Compliance Officer  
Health Net Community Solutions, Inc.  
21281 Burbank Blvd  
Woodland Hills, CA 91367

CAP RESPONSE REGARDING PROVIDER SCREENING, ENROLLMENT AND  
CREDENTIALING, AND INTEROPERABILITY REQUIREMENTS, WITH IMPACTS TO  
PROVIDER DIRECTORY

Dear Ms. Bosse,

On December 12, 2025, the Department of Health Care Services (DHCS) sent Health Net Community Solutions, Inc. (Health Net) a Notice of Deficiency (NOD) pursuant to Dental Managed Care plan (Dental MCP) Boilerplate Contract Exhibit A8 Section 9, Exhibit A14.4 Subsection 5.d, and All Plan Letters (APLs) 25-010, 22-013, and 18-004.

Health Net submitted a Corrective Action Plan (CAP) to DHCS on January 9, 2026, and a revised CAP on February 2, 2026. On March 3, 2026, DHCS responded to the submitted CAP from HN requesting additional documentation to meet the requirements consistent with APL 25-010.

On March 30, 2026, HN submitted a CAP response to DHCS. DHCS has reviewed HN's submissions and has determined that HN has sufficiently resolved their CAP. This CAP is closed effective March 30, 2026.

DHCS will continue to monitor HN's compliance with the Dental MCP contract, federal and state regulations, and APLs. DHCS reserves the right to implement sanctions or other enforcement actions should HN resume non-compliance with the terms of the contract. Should there be future enforcement actions, prior history can and will be



Ms. Bosse

Page 2

April 9, 2026

factored into the enforcement actions. If you have any questions regarding this notice, please contact DHCS at [dmcdeliverables@dhcs.ca.gov](mailto: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

Dental Managed Care Plan: Health Net Community Solutions, Inc.

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
<p>Health Net did not comply with Exhibit A14.4 Subsection 5. d.</p> <ul style="list-style-type: none"> <li>» ADA status was not displayed in either the electronic or hard copy provider directories. This was due to the</li> </ul>	<p>System Updates:</p> <ul style="list-style-type: none"> <li>» 1/9/26: The API was updated to pull ADA details from the source system into the online directory (Attachment A).</li> <li>» 1/9/26: ADA data was collected from</li> </ul>	<p>System Updates:</p> <ul style="list-style-type: none"> <li>» 1/9/26: Attachment A CDN API Screenshots</li> <li>» 1/9/26: Attachment B-DQ.HN Online</li> </ul>	<p>System Updates:</p> <ul style="list-style-type: none"> <li>» 1/9/26: ADA API-12/10/25</li> <li>» 1/9/26: Online Directories 12/19/25</li> <li>» 1/9/26: PDF of the paper Directory 12/22/25</li> </ul>	<p>3/3/26: DHCS accepts the submitted documentation. DHCS finds that the Provider Directory is missing requirements consistent with APL 25-010, including inaccuracies with pregnant women</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p>absence of ADA information in the source system and API's inability to transmit this data to the electronic/hard copy directories.</p> <p>» 2/2/26: Two additional fields within the provider directory are not displayed: Accepting Pregnant Women and Cultural Competency Indicators. Note: Per DHCS request via email dated 1/29/26 the Plan is adding the corrective action steps for this issue to this CAP response.</p>	<p>502 provider locations, entered into the source system, and reflected in online and paper directories 12/22/25 (Attachments B, C, E).</p> <p>» 2/2/26: Conducted a complete audit of the provider directories in January 2026. Addition of missing indicators for Accepting Pregnant Women and Cultural Competency to be completed by 2/28/26.</p> <p>Controls Implemented:</p>	<p>Provider Directory 1.2026</p> <p>» 1/9/26: Attachment C-CA HNET SAC Dec 22 2025 and Attachment C-CA HNET LA-Dec 22 2025</p> <p>» 1/9/26: Attachment E-GOV CA Network GID Query 12.18.2025</p> <p>Controls Implemented:</p> <p>» 1/9/26: Attachment D New Provider Checklist 12.2026</p> <p>» 1/9/26: Attachment D-CA_PE.001_Provider Engagement New Provider</p>	<p>» 2/2/26: Indicators for Accepting Pregnant Women and Cultural Competency 2/28/26.</p> <p>Controls Implemented:</p> <p>» 1/9/26: Provider Checklist and Policy 1/1/2026</p> <p>» 1/9/26: Provider Engagement Training Attestation 1/5/26</p> <p>» 1/9/26: Verification audits performed weekly 1/5/2026.</p> <p>3/30/26 Follow-up Response:</p> <p>» Corrections to the paper Provider</p>	<p>and cultural competency. This CAP remains open.</p> <p>4/9/26: DHCS accepts the documentation that the ADA provider information is being transmitted to the provider directories. This CAP is closed as of 3/30/26.</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<ul style="list-style-type: none"> <li>» 1/9/26: An ADA verification process was added to onsite onboarding visits effective 1/1/2026 (Attachment D).</li> <li>» 1/9/26: Contracts are no longer accepted as complete and final without ADA verification; only complete contracts may be accepted effective 1/1/2026 (Attachment D).</li> <li>» 1/9/26: Weekly ADA indicator reports will be reviewed for quality control effective 12/19/2025.</li> </ul>	<p>Credentialing Process</p> <ul style="list-style-type: none"> <li>» 1/9/26: Attachment D New Provider Policy Timeline Training Attestation</li> </ul> <p>3/30/26 Follow-up Response:</p> <ul style="list-style-type: none"> <li>» CDN Online Provider Directory- Attachment B.1.</li> <li>» Paper Provider Directories: HN LA Mar 2026 Provider Directory 20260317 and HN SAC Mar 2026 Provider Directory 20260317</li> <li>» 3-5-26 Weekly ADA Report Handicap-Verification Audit</li> </ul>	<p>Directory were completed on 2/26/2026 &amp; 3/12/2026</p> <ul style="list-style-type: none"> <li>» Corrections to the online Provider Directory were completed on 2/9/2026</li> </ul>	

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>3/30/26 Follow-up Response:</p> <ul style="list-style-type: none"> <li>» The additional missing fields were added in accordance with Exhibit A14.4 Subsection 5.d. (pregnancy/cultural competency/teledentistry)</li> </ul>			
<p>Health Net did not comply with APL 22-013.</p> <ul style="list-style-type: none"> <li>» The provider directory did not include ADA information because the API failed to transmit the data, and the source system did not consistently capture or maintain it.</li> </ul>	<p>Actions Taken to Address Missing ADA Data:</p> <ul style="list-style-type: none"> <li>» 1/9/26: API Update – The API was modified to pull ADA details into the online provider directory (Attachment A).</li> <li>» 1/9/26: Source System Update – ADA data was collected from 502</li> </ul>	<p>API Updates:</p> <ul style="list-style-type: none"> <li>» 1/9/26: Attachment A-CDN API Screenshots</li> </ul> <p>Source System:</p> <ul style="list-style-type: none"> <li>» 1/9/26: Attachment B-DQ.HN Online Provider Directory 1.2026</li> <li>» 1/9/26: Paper Directories Attachment C-CA</li> </ul>	<ul style="list-style-type: none"> <li>» 1/9/26: Online Directories-12/19/25</li> <li>» 1/9/26: PDF provider directory with ADA indicator-12/22/25</li> <li>» 1/9/26: New Policy effective 1/1/2026</li> <li>» 1/9/26: New Policy training attestation email 1/5/2026</li> </ul>	<p>3/3/26: DHCS accepts the submitted documentation. DHCS finds that the Provider Directory is missing requirements consistent with APL 25-010 and APL 22-013. This CAP remains open.</p> <p>4/9/26: DHCS accepts the documentation that the ADA provider</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>provider locations and entered into the source system. On 12/19/2025, the updated data flowed into both online and paper directories (Attachments B, C, E).</p> <p>» 1/9/26: Policy &amp; Training – A new policy requiring ADA data collection during enrollment became effective 1/1/2026, and Provider Engagement staff were trained on 1/5/2026 (Attachment D).</p> <p>3/30/26 Follow-up Response:</p>	<p>HN SAC Dec 22 2025 and Attachment C-CA HNET LA – Dec 22 2025</p> <p>» 1/9/26: Indicator in source system Attachment E-GOV CA Network GID Query 12.18.2025</p> <p>Policy &amp; Training:</p> <p>» 1/9/26: Attachment D New Provider Checklist 12.2026</p> <p>» 1/9/26: Attachment D CA_PE.001_Provider Engagement New Provider Credentialing Process</p> <p>» 1/9/26: Attachment D New Provider Policy</p>	<p>3/30/26 Follow-up Response:</p> <p>» Corrections to the paper Provider Directory were completed on 2/26/2026 &amp; 3/12/2026</p> <p>» Corrections to the online Provider Directory were completed on 2/9/2026</p>	<p>information is successfully transmitting API consistent with APL 22-013. This CAP is closed as of 3/30/26.</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<ul style="list-style-type: none"> <li>» The additional missing fields were added in accordance with APL 22-013. (pregnancy/cultural competency/teledentistry)</li> </ul>	<p>Timeline Training Attestation</p> <p>3/30/26 Follow-up Response:</p> <ul style="list-style-type: none"> <li>» CDN Online Provider Directory- Attachment B.1.</li> <li>» Paper Provider Directories: HN LA Mar 2026 Provider Directory 20260317 and HN SAC Mar 2026 Provider Directory 20260317</li> <li>» 3-5-26 Weekly ADA Report Handicap-Verification Audit</li> </ul>		
<p>Health Net did not comply with APL 18-004 and Exhibit A8, Section 9 Provider Network screening,</p>	<p>Actions Taken:</p> <ul style="list-style-type: none"> <li>» 1/9/26: Created a new policy requiring ADA</li> </ul>	<ul style="list-style-type: none"> <li>» 1/9/26: Attachment D New Provider Checklist 12.2026</li> </ul>	<ul style="list-style-type: none"> <li>» 1/9/26: New Policy effective 1/1/2026</li> </ul>	<p>3/3/26: DHCS accepts the submitted documentation. DHCS requests documentation that</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
<p>enrollment, credentialing requirements.</p> <p>» The plan did not collect ADA information during network enrollment. As a result, the Credentialing team defaulted the ADA indicator in the source system to “No” to maintain data integrity when information was unavailable.</p>	<p>information as a mandatory field for all provider contracts. Provider Engagement will collect this data during enrollment, and incomplete contracts will be returned. Policy effective 1/1/2026 (Attachment D).</p> <p>» 1/9/26: PE staff completed training on 1/5/2026 (Attachment D).</p> <p>3/30/26 Follow-up Response:</p> <p>» The additional missing fields were added in accordance with APL 18-004; Exhibit A8 Section 9. (pregnancy/cult</p>	<p>» 1/9/26: Attachment D-CA_PE.001_Provider Engagement New Provider Credentialing Process</p> <p>» 1/9/26: Attachment D New Provider Policy Timeline Training Attestation</p> <p>3/30/26 Follow-up Response:</p> <p>» CDN Online Provider Directory- Attachment B.1.</p> <p>» Paper Provider Directories: HN LA Mar 2026 Provider Directory 20260317 and HN SAC Mar 2026 Provider Directory 20260317</p>	<p>» 1/9/26: New Policy training attestation email 1/5/2026</p> <p>3/30/26 Follow-up Response:</p> <p>» Corrections to the paper Provider Directory were completed on 2/26/2026 &amp; 3/12/2026</p> <p>» Corrections to the online Provider Directory were completed on 2/9/2026</p>	<p>provider screening, enrollment, and credentialing will be inclusive of all requirements pursuant to APL 25-010, as there are additional fields missing on the provider directory. This CAP remains open.</p> <p>4/9/26: DHCS accepts the submitted documentation and has determined that HN is collecting accurate ADA information during network enrollment consistent with APL 18-004. This CAP is closed as of 3/20/26.</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>ural competency /teledentistry)</p>	<p>» 3-5-26 Weekly ADA Report Handicap-Verification Audit</p>		
<p>Health Net did not comply with APL 25-010</p> <p>» ADA status was not shown in either the electronic or paper provider directories because the source system lacked ADA details and the API did not transmit this data.</p>	<p>Actions Taken:</p> <p>» 1/9/26: Policy &amp; Process – Created a new policy requiring ADA information as a mandatory field for all provider contracts. Provider Engagement (PE) collects this data during enrollment, and incomplete contracts are returned. Policy effective 1/1/2026; PE staff trained 1/5/2026 (Attachment D).</p>	<p>Policy &amp; Process:</p> <p>» 1/9/26: New Attachment D New Provider Checklist 12.2026</p> <p>» 1/9/26: Attachment D-CA_PE.001_Provider Engagement New Provider Credentialing Process</p> <p>» 1/9/26: Attachment D New Provider Policy Timeline Training Attestation</p> <p>System &amp; Directory:</p>	<p>Policy &amp; Process:</p> <p>» 1/9/26: Provider Checklist and Policy 1/1/2026</p> <p>» 1/9/26: Provider Engagement Staff trained 1/5/26</p> <p>System &amp; Directory:</p> <p>» 1/9/26: ADA- API- 12/10/25</p> <p>» 1/9/26: Online Directories- 12/19/25</p> <p>» 1/9/26: PDF of the Paper Directory- 12/22/25</p> <p>3/30/26 Follow-up Response:</p>	<p>3/3/26: DHCS accepts the submitted documentation. DHCS finds that the Provider Directory is missing requirements consistent with APL 25-010, including inaccuracies with pregnant women and cultural competency. This CAP remains open.</p> <p>4/9/26: DHCS accepts the submitted documentation and determines that HN's electronic and paper provider directories</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>» 1/9/26: System &amp; Directory Updates – On 12/10/2025, the API was updated to include ADA status in the online directory. ADA data was collected from 502 provider locations and entered into the source system on 12/19/2025, enabling updates to online and paper directories. Updated PDFs were provided to the vendor on 12/22/2025 (Attachments A, B, C, E).</p> <p>3/30/26 Follow-up Response:</p> <p>» The additional missing fields</p>	<p>» 1/9/26: API- Attachment A- CDN API Screenshots</p> <p>» 1/9/26: Electronic Directories- Attachment B- DQ.HN Online Provider Directory 1.2026</p> <p>» 1/9/26: Paper Directories Attachment C-CA HN SAC Dec 22 2025 and Attachment C-CA HNET LA – Dec 22 2025</p> <p>» 1/9/26: Indicator in source system Attachment E-GOV CA Network GID Query 12.18.2025</p> <p>3/30/26 Follow-up Response:</p>	<p>» Corrections to the paper Provider Directory were completed on 2/26/2026 &amp; 3/12/2026</p> <p>» Corrections to the online Provider Directory were completed on 2/9/2026</p>	<p>are inclusive of ADA details and has complied with APL 25-010. This CAP is closed effective 3/30/26.</p>

Finding and Summary	Action Taken	Supporting Documentation	Implementation Date	DHCS Comments
	<p>were added in accordance with APL 25-010. (pregnancy/cultural competency/teledentistry)</p>	<ul style="list-style-type: none"> <li>» CDN Online Provider Directory- Attachment B.1.</li> <li>» Paper Provider Directories: HN LA Mar 2026 Provider Directory 20260317 and HN SAC Mar 2026 Provider Directory 20260317</li> <li>» 3-5-26 Weekly ADA Report Handicap-Verification Audit</li> </ul>		