

2026 Q2 Corrective Action Plans (CAPs) Log

LOB	Entity Issued To	Topic/Function	Method of Identification	Description of Issue	Issue Date	Implementation Date	Status	Reference Number
	IPA Name or IEHP		IEHP Audit IEHP Monitoring			The Latest Date on the CAP Form.	CAP in Progress CAP Accepted/CAP Validation Scheduled CAP Validation in	
Medicare	HPN - Regal Medical Group	ICAP: Denial Decision Timeliness Rate and Denial Notification Rate	IEHP Monitoring	CAPs for these deficiencies have not resulted in sustained improvements.	6/15/2026	TBD	In Progress	N/A
Medicare	Epic	ICAP: Denial Notification Timeliness	IEHP Monitoring	CAP for this deficiency has not resulted in sustained improvements.	6/15/2026	TBD	In Progress	N/A
Medicare	HPN - Desert Oasis Health Care	D-SNP File Review Element: Not all cases demonstrated Documentation of 3 attempts for Member outreach prior to determining Member is unable to reach	IEHP Monitoring	Standard not met 2 consecutive months.	6/5/2026	7/02/2026 Follow up: 10/02/2026	Open & Monitoring	N/A
Medicare	IEHP - Direct	D-SNP File Review Element: Member contacted per Stratification and HRA identified risks and main concerns addressed within ICP	IEHP Monitoring	Standard not met 2 consecutive months.	6/5/2026	TBD	In Progress	N/A

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Medicare	IEHP - Direct	Appeal Overturn Rate	IEHP Monitoring	Standard not met 2 consecutive months.	6/5/2026	TBD	In Progress	N/A
Medicare	IEHP	Part B: UM Timeliness	Monitoring	The metric (PH-30) RxUM Timeliness (expedite) (Part B): % of Part B expedited determinations processed within 24 hours, performed below the threshold of 95% during the months of March 2026 and April 2026. For the months of March and April the scores were both at 93%.	6/4/2026	TBD	CAP in Progress	1588
Medi-Cal	IEHP	Appeals: Timeliness	Monitoring	Metric for Medi-Cal Appeals; % processed within 30 days (standard) metric (GA4) performed below the threshold of 95% during the months of March and April 2026. The scores for March and April were at 94% and 87%, respectively.	6/1/2026	TBD	CAP in Progress	1617
Medicare	IEHP - BH	Denial Decision Timeliness Rate	IEHP Monitoring	Standard not met for 2 consecutive months.	5/7/2026	TBD	In Progress	N/A

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Medicare	IEHP - BH	Denial Decision Timeliness Rate	IEHP Monitoring	Standard not met for 2 consecutive months.	5/7/2026	TBD	In Progress	N/A
Medi-Cal Medicare	Vendor- Language Line	Certification	Audit	LanguageLine failed to ensure its interpreters have the current required certification or trainings.	4/24/2026	6/5/2026	CAP Accepted Validation Scheduled	9179748
Medicare	HPN - Regal Medical Group	Provider Grievance Response Timeliness Rate	IEHP Monitoring	Standard not met 2 consecutive months.	4/7/2026	5/19/2026 Follow up: 08/19/2026	Open & Monitoring	N/A
Medicare	IEHP - Direct	D-SNP File Review Element: Documentation of review of the HRA and Documentation of 3 attempts (different dates and times) for Member outreach prior to determining Member(s) is unable to reach	IEHP Monitoring	Standard not met 2 consecutive months.	4/7/2026	6/02/2026 Follow Up: 9/01/2026	Open & Monitoring	N/A

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Medicare	IEHP - Direct	ODAG CMS Program Audit Universe: Record Layout OD # of Issue Types	IEHP Monitoring	Standard not met 2 consecutive months.	4/7/2026	TBD	In Progress	N/A
Medicare	IEHP	Appeals: Timeliness	Monitoring	Metric for Medicare Appeals; % processed within 72 hours (Part C expedited) metric (GA8) performed below the threshold of 95% during the months of January through March 2026.	3/26/2026	3/31/2026	CAP Accepted Validation Scheduled	8800132
Medicare	IEHP	Appeals: Timeliness	Monitoring	Metric for Medicare Appeals; % processed within 72 hours (Part B standard) metric (GA18) performed below the threshold of 95% during the months of January and February 2026.	3/26/2026	7/1/2026	CAP Accepted Validation Scheduled	88001515
Medi-Cal Medicare	IEHP	Member Communication - Letters & Threshold Languages Validation	Audit	The Plan failed to translate the Member Letter into the appropriate threshold language.	3/17/2026	8/8/2026	CAP Accepted Validation Scheduled	6483879 6483610 4332504 4332417

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Medi-Cal	IEHP	Member Communication - Letters & Threshold Languages Validation	Audit	The Plan failed to provide Member Letters in alternative formats.	3/17/2026	8/7/2026	CAP Accepted Validation Scheduled	8659530 8659529 6483879 6483610 4332504 4332417
Medi-Cal Medicare	IEHP	Member Communication - Letters & Threshold Languages Validation	Audit	The Plan failed to accurately include the DMHC disclosure statement verbatim required by Section 1368.02(b).	3/17/2026	8/7/2026	CAP Accepted Validation Scheduled	6483879 6483610 4332504 4332417
Medi-Cal Medicare	IEHP	Member Communication - Letters & Threshold Languages Validation	Audit	The Plan failed to translate the non-templated language of the Letter into the appropriate threshold languages.	3/17/2026	6/1/2026	CAP Accepted Validation Scheduled	6483879 6483610 4332504 4332417
Medi-Cal Medicare	IEHP	Member Communication - Letters & Threshold Languages Validation	Audit	The Plan failed to translate the Member Letter into the appropriate threshold language.	3/17/2026	6/1/2026	CAP Accepted Validation Scheduled	6483609 6483590 4332504 4332417

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Medi-Cal Medicare	IEHP	Member Communication - Letters & Threshold Languages Validation	Audit	The Plan failed to translate the non-templated language of the Letter into the appropriate threshold languages.	3/17/2026	6/1/2026	CAP Accepted Validation Scheduled	6483609 6483590 4332504 4332417
Medicare	IEHP	Member Communication - Letters & Threshold Languages Validation	Audit	The Plan failed to provide Member Letters in alternative formats.	3/17/2026	6/1/2026	CAP Accepted Validation Scheduled	6483609 6483590 4332504 4332417
Medi-Cal	IEHP	Member Communication - Letters & Threshold Languages Validation	Audit	The Plan failed to use the correct template or attachment.	3/17/2026	6/1/2026	CAP Accepted Validation Scheduled	8659036 8659035 6483609 6483590 4332504 4332417
Medi-Cal Medicare	IEHP	Member Communication - Letters & Threshold Languages Validation	Audit	The Plan failed to use the correct template or attachment.	3/17/2026	10/4/2026	CAP Accepted Validation Scheduled	6483879 6483610 4332504 4332417

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Medi-Cal	IEHP	Payment Disputes	Monitoring	Metric for Medi-Cal Payment Disputes (MED 2b), 95% of PDRs finalized within 45 days, performed below the benchmark for the months of November 2025 - January 2026.	3/16/2026	6/30/2026	CAP Accepted Validation Scheduled	1687
Medi-Cal	IEHP	PDR Acknowledgement Letters	Monitoring	Metric for Medi-Cal PDR Acknowledgement Letters, 95% of Acknowledgment letters sent within 15 working days, performed below the benchmark for the months of November 2025 - January 2026.	3/16/2026	6/30/2026	CAP Accepted Validation Scheduled	1687
Medicare	HPN - Desert Oasis Health Care	TOC Element: Member's identified care coordination needs addressed	IEHP Monitoring	Standard not met 2 consecutive months.	3/6/2026	3/9/2026 Follow up: 7/09/2026	Open & Monitoring	N/A
Medi-Cal	IEHP	Authorization Timeliness	Audit	The Plan failed to process the ECM authorization within five (5) business days of receipt of information reasonably necessary to make the decision.	2/18/2026	8/1/2026	CAP Accepted Validation Scheduled	9

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Medi-Cal	IEHP	Comprehensive Health Assessment Timeliness	Audit	The Plan failed to complete the Comprehensive Health Assessment (CHA) within ninety (90) days of enrollment in ECM.	2/18/2026	6/1/2026	CAP Accepted Validation Scheduled	9
Medi-Cal	IEHP	Member Outreach	Audit	The Plan failed to complete the ECM outreach attempts within the required timeframes according to the Member's level of care.	2/18/2026	6/1/2026	CAP Accepted Validation Scheduled	9
Medi-Cal	IEHP	Discontinuation Notice	Audit	The Plan failed to send the discontinuation notice to the Member.	2/18/2026	6/1/2026	CAP Accepted Validation Scheduled	9
Medicare	IEHP	Compliance Program	Audit	IEHP DualChoice CMS Mock Audit: Sponsor did not establish and implement an effective system for routine monitoring based on the identification of compliance risks.	1/23/2026	8/31/2026	CAP Accepted Validation Scheduled	7999379 8580442

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Medicare	IEHP	Compliance Program	Audit	IEHP DualChoice CMS Mock Audit: Sponsor did not communicate issues of noncompliance in a timely manner, preventing the Compliance Department from promptly responding to the issues.	1/23/2026	8/1/2026	CAP Accepted Validation Scheduled	7999379 8580442
Medicare	IEHP	Compliance Program	Audit	IEHP DualChoice CMS Mock Audit: Sponsor did not establish and implement procedures and a system for promptly responding to compliance issues as they are raised, investigating potential compliance problems as identified in the course of self-evaluations and audits, correcting such problems promptly and thoroughly to reduce the potential for recurrence, and ensure ongoing compliance with CMS requirements	1/23/2026	8/1/2026	CAP Accepted Validation Scheduled	7999379 8580442

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LOB	Entity Issued To	Topic/Function	Method of Identification	Description of Issue	Issue Date	Implementation Date	Status	Reference Number
Medicare	IEHP	Compliance Program	Audit	IEHP DualChoice CMS Mock Audit: Sponsor’s Compliance Officer failed to demonstrate an understanding of the guidance and requirements surrounding the operation or sufficient involvement and awareness of issues of noncompliance within the business areas.	1/23/2026	6/1/2026	CAP Accepted Validation Scheduled	7999379 8580442
Medicare	IEHP	Individualized Care Plans	Audit	IEHP DualChoice CMS Mock Audit:The Sponsor did not provide evidence of ICP implementation through care or case management documentation. There was no supporting documentation in the care or case management notes to confirm that ICPs were actively executed or monitored as required.	1/23/2026	4/1/2026	CAP Validation in Progress	7999379
Medicare	IEHP	Individualized Care Plans	Audit	IEHP DualChoice CMS Mock Audit:The Sponsor did not review and/or revise Individualized Care Plans (ICPs) in accordance with its approved Model of Care (MOC) or as warranted by changes in the enrollee’s health status.	1/23/2026	3/1/2026	CAP Validation in Progress	7999379

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Medicare	IEHP	Individualized Care Plans	Audit	IEHP DualChoice CMS Mock Audit:The Sponsor did not effectively coordinate communication of ICPs among plan personnel, providers, and enrollees.	1/23/2026	3/1/2026	CAP Validation in Progress	7999379
Medicare	IEHP	Individualized Care Plans	Audit	IEHP DualChoice CMS Mock Audit: Individualized Care Plans (ICP) did not address issues identified in Health Risk Assessments (HRA). The Sponsor lacked a standardized process to ensure that findings from HRAs were systematically incorporated into the development and updating of each enrollee’s ICP.	1/23/2026	3/1/2026	CAP Validation in Progress	7999379

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Medicare	IEHP	Part D Coverage Determinations	Audit	IEHP DualChoice CMS Mock Audit: Sponsor failed to send required correspondence to enrollees' representatives. Sponsor's pharmacy department did not follow its coverage determination and redetermination notification processes for sending correspondence to enrollees' authorized representatives. Enrollees' representatives did not receive notification of coverage determination or redetermination decisions. This results in representatives not having the information required to take appropriate action.	1/23/2026	5/11/2026	CAP Validation in Progress	7999379
Medicare	IEHP	Part D Formulary Administration	Audit	IEHP DualChoice CMS Mock Audit: Sponsor improperly effectuated a prior authorization or exception request. The first root cause was the sponsor's failure to apply the correct quantity limit dosage on an approved quantity limit exception The second root cause was the sponsor's failure to configure a prior authorization to ensure the medication could be paid under the Part D benefit for a hospice enrollee The third root cause was the sponsor's failure to properly effectuate a non-formulary exception for an enrollee who had received approval to access the non-formulary brand version of a product	1/23/2026	3/13/2026	CAP Validation in Progress	7999379

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Medicare	IEHP	Part D Coverage Determinations	Audit	IEHP DualChoice CMS Mock Audit:Sponsor made inappropriate denials when processing coverage determinations. There are two (2) cases impacted. In both instances, it is recommended to perform timely oversight of cases to ensure appropriate clinical decisions	1/23/2026	7/1/2025	CAP Validation in Progress	7999379
Medicare	IEHP	Open Grievance Process	Audit	Oral Resolution Grievance: The Plan failed to identify the provider in question.	1/14/2026	5/15/2026	CAP Accepted Validation Scheduled	8556879
Medicare	IEHP	Open Grievance Process	Audit	Oral Resolution Grievance: The Plan failed to correctly identify the grievance category.	1/14/2026	5/15/2026	CAP Accepted Validation Scheduled	8556879
Medicare	IEHP	Open Grievance Process	Audit	Oral Resolution Grievance: The Plan failed to provide oral resolution to Member.	1/14/2026	5/15/2026	CAP Accepted Validation Scheduled	8556879

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Medicare	IEHP	Open Grievance Process	Audit	Oral Resolution Grievance: The Plan failed to classify and process the grievance appropriately (Standard grievance was not identified or routed to G&A for processing).	1/14/2026	5/15/2026	CAP Accepted Validation Scheduled	8556879
Medicare	IEHP	Open Grievance Process	Audit	Standard Grievance: The Plan failed to obtain a valid AOR prior to processing the grievance.	1/14/2026	3/30/2026	CAP Accepted Validation Scheduled	8556679
Medicare	IEHP	Open Grievance Process	Audit	Standard Grievance: The Plan failed to send the Acknowledgement Letter within 5 calendar days.	1/14/2026	9/17/2025	CAP Accepted Validation Scheduled	8556679
Medicare	IEHP	Open Grievance Process	Audit	Standard Grievance: The Plan failed to send the Resolution Letter within 30 calendar days.	1/14/2026	2/26/2025	CAP Accepted Validation Scheduled	8556679
Medicare	IEHP	Open Grievance Process	Audit	Oral Resolution Grievance: The Plan failed to send the Acknowledgement Letter within 5 calendar days.	1/14/2026	5/15/2026	CAP Accepted Validation Scheduled	8556879
Medicare	IEHP	Open Grievance Process	Audit	Oral Resolution Grievance: The Plan failed to consistently disposition cases which resulted in incomplete or inaccurate reporting.	1/14/2026	5/5/2026	CAP Accepted Validation Scheduled	8556879

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Medicare	IEHP	Open Grievance Process	Audit	Standard Grievance: The Plan failed to conduct outreach attempts to obtain the necessary information to resolve the Member’s grievance.	1/14/2026	5/1/2026	CAP Accepted Validation Scheduled	8556679
Medicare	IEHP	Open Grievance Process	Audit	Standard Grievance: The Plan failed to classify and process the grievance appropriately (Standard grievance was not identified or routed to G&A for processing).	1/14/2026	2/27/2026	CAP Accepted Validation Scheduled	8556679
Medicare	IEHP	Open Grievance Process	Audit	Standard Grievance: The Plan failed to correctly identify the grievance category.	1/14/2026	5/28/2025	CAP Accepted Validation Scheduled	8556679
Medicare	IEHP	Open Grievance Process	Audit	Oral Resolution Grievance: The Plan failed to obtain a valid AOR prior to processing the grievance.	1/14/2026	5/15/2026	CAP Accepted Validation Scheduled	8556879
Medicare	IEHP	Open Grievance Process	Audit	Oral Resolution Grievance: The Plan failed to conduct outreach attempts to obtain the necessary information to resolve Member’s grievance.	1/14/2026	5/15/2026	CAP Accepted Validation Scheduled	8556879
Medicare	HPN - Desert Oasis Health Care	UM Denial File Review Score	IEHP Monitoring	Standard not met 2 consecutive months.	1/7/2026	2/27/2026 Follow up: 7/27/2026	Open & Monitoring	N/A

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Medicare	PrimeCare	Denial Notification Timeliness Score	IEHP Monitoring	Standard not met 2 consecutive months.	1/7/2026	3/16/2026 Follow Up: 7/31/2026	Open & Monitoring	N/A
Medi-Cal	Vendor: Call the Car	Transportation Services	Audit	M&O #2: Call the Car failed to evidence that auditing and/or monitoring activities were being reported to the appropriate oversight body.	12/31/2025	1/30/2026	CAP Accepted Validation Scheduled	12
Medi-Cal	Vendor: Call the Car	Transportation Services	Audit	M&O #1: The Plan and Call the Car failed to have appropriate monitoring and oversight of its transportation network providers and subcontractors.	12/31/2025	4/1/2026	CAP Accepted Validation Scheduled	12
Medi-Cal	Vendor: Call the Car	Transportation Services	Audit	NMT #1: Call the Car failed to meet timely access standards for transportation in two (2) out of sixty (60) NMT trips reviewed.	12/31/2025	3/9/2026	CAP Accepted Validation Scheduled	12
Medi-Cal	Vendor: Call the Car	Transportation Services	Audit	NEMT #8: The Plan and Call the Car failed to provide the appropriate level of service for Members requiring ambulatory door-to-door service in ten (10) out of sixty (60) NEMT trips reviewed.	12/31/2025	1/1/2026	CAP Accepted Validation Scheduled	12

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Medi-Cal	Vendor: Call the Car	Transportation Services	Audit	NEMT #7: Call the Car failed to ensure the details of the Members call are accurate. (Reservation made for a non-medical appointment) in one (1) out of sixty (60) NEMT trips reviewed.	12/31/2025	4/1/2026	CAP Accepted Validation Scheduled	12
Medi-Cal	IEHP	Transportation Services	Audit	NEMT #6: The Plan failed to ensure PCS forms contained all required fields in one (1) out of sixty (60) NEMT trips reviewed.	12/31/2025	2/26/2026	CAP Accepted Validation Scheduled	12
Medi-Cal	IEHP	Transportation Services	Audit	NEMT #5: The Plan failed to ensure the appropriate NEMT modality is utilized in two (2) out of sixty (60) NEMT trips reviewed.	12/31/2025	2/26/2026	CAP Accepted Validation Scheduled	12
Medi-Cal	Vendor: Call the Car	Transportation Services	Audit	NEMT #4: The Plan and Call the Car failed to meet timely access standards for transportation in nine (9) out of sixty (60) NEMT trips reviewed.	12/31/2025	2/26/2026	CAP Accepted Validation Scheduled	12
Medi-Cal	IEHP	Transportation Services	Audit	NEMT #3: The Plan failed to authenticate the call properly in three (3) out of sixty (60) NEMT trips reviewed.	12/31/2025	2/26/2026	CAP Accepted Validation Scheduled	12

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Medi-Cal	Vendor: Call the Car	Transportation Services	Audit	NEMT #2: The Plan failed to ensure transportation providers are billing appropriately before processing the claim in seven (7) out sixty (60) NEMT trips reviewed. Claim submissions included incorrect information or did not include all the required information.	12/31/2025	2/26/2026	CAP Accepted Validation Scheduled	12
Medi-Cal	IEHP	Transportation Services	Audit	NEMT #1: The Plan failed to obtain a PCS Form in twenty (20) out of sixty (60) NEMT trips reviewed.	12/31/2025	2/14/2026	CAP Accepted Validation Scheduled	12
Medicare	Epic	Cancellation/Dismissals File Review Score	IEHP Monitoring	Standard not met 2 consecutive months.	9/5/2025	10/13/2025 Follow up: 06/28/2026	Open & Monitoring	N/A
Medicare	CPN	Denial File Review Score	IEHP Monitoring	Standards not met 2 consecutive months.	9/5/2025	12/08/2025 Follow Up: 9/19/2026	Open & Monitoring	N/A
Medicare	ASH	ASH Denial Language	IEHP Monitoring	Standards not met 2 consecutive months.	9/5/2025	2/25/2026 Follow Up: 7/23/2026	Open & Monitoring	N/A

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Medicare	IEHP	Claims Timeliness	Monitoring	Metric MCR 1b - Medicare Claims (95% of claims must be processed within 60-days) performed below the benchmark for the months of May 2025 and June 2025.	7/30/2025	TBD	CAP In Progress	1456