



December 22, 2014

Wendy Soe, Senior Advisor for Policy Development
Department of Health Care Services
1501 Capitol Mall. MS 0000
P.O. Box 997413
Sacramento, CA 95899-7413

Re: 1115 Waiver Renewal

Dear Ms. Soe,

Access Dental appreciates the opportunity to offer our perspective to the Department of Health Care Service (DHCS) on the “Bridge to Reform” Waiver and the Department’s goals to enhance delivery, quality and cost efficiency of care; assure viability of the Medicaid delivery system post the ACA implementation; and maintain momentum of the program’s successes to date. As DHCS evaluates a path forward, we strongly recommend that DHCS expand managed dental care beyond the existing two counties (Los Angeles and Sacramento), an approach that would support the Department’s goal of improving access to care and benefit the millions of Medi-Cal and Denti-Cal recipients.

The expansion of dental services through a managed care environment will contribute both to improving overall health outcomes for California’s Medi-Cal recipients, as well as achieving better care coordination, quality outcomes/measure and cost management. As the Medi-Cal population continues to grow, we encourage the Department to embrace a managed dental care model as a means to effectively provide services to the many new (and existing) Medi-Cal enrollees.

As you know, the role of oral disease in systemic health issues has been well documented. As *Scientific American* reported, “There is a dawning realization that it is often a dentist or periodontist who first discovers a larger health problem, by what they see in a patient’s mouth...” Expanding the Medi-Cal Dental Managed Care program beyond its limited scope in just two counties can achieve the dual objective of supporting improved enrollees’ overall health outcomes and addressing the state’s current concern surrounding sufficient access to dental services.

Expanding dental coverage under a managed care model into counties currently structured around fee-for-service, allows DHCS to replace the existing structure with one that better

positions the department to target its objectives as stated above. Specifically, a dental managed care structure will provide DHCS with several desirable outcomes:

- Financial Predictability – Because managed care costs are calculated according to a fixed dollar amount multiplied by total enrollees, expenses are predictable and manageable. This approach would enable California to further maximize the federal matching funds, as well as state General Fund monies, that go into the program.
- Strict Reporting and Oversight Requirements – Access Dental and other dental managed care providers must adhere to strict Knox-Keene licensing standards that govern a number of quality drivers such as: timely access; provider network adequacy; member utilization; grievance resolution; language assistance; and transportation. Furthermore, since managed care plans frequently are audited and must report on the above requirements, resulting dental services are maintained at a consistently high quality level. These consumer protections are not required in a fee-for-service environment.
- Greater Provider Access – Dental Managed Care Plans must maintain a ratio of at least one Dental Provider to every 2,000 plan Enrollees.
- Transparency – With stand-alone dental plans operating under a managed care model, DHCS always will have clear line of sight into the specific costs of procedures, reimbursement rates and other cost drivers necessary to help ensure overall financial management of Denti-Cal. Dental Managed Care plans are regulated by the Department of Managed Health Care who oversees strict Knox Keene requirements that align with DHCS Program requirements.

For a variety of reasons, the health care needs of California are different from those of other states. Consequently, DHCS's payment and delivery reform initiatives must be driven from the perspective of what's best for California, and what is most likely to succeed here. California should embrace the same managed care approach for dental services that it has successfully applied to medical services for Medi-Cal enrollees throughout the State.

As a Sacramento-based company founded 25 years ago by a practicing Dentist, Access Dental is intimately familiar with the state's dental needs, infrastructure -- and most important, opportunities for growing and improving the dental program for Medi-Cal beneficiaries, having partnered with DHCS in this valuable program.

We encourage DHCS to strongly consider how the expansion of dental managed care can serve as a key plank as it continues to explore constructs for the 1115 Waiver. To that end, we further

recommend that the Department consider how it can leverage the forthcoming Denti-Cal RFP as a part of that effort, focusing on quality care and outcomes.

Thank you for the opportunity to offer our perspective. Access Dental stands ready to work with DHCS to facilitate ongoing improvements to the Medi-Cal dental program for the benefit of Californians. Should you have any questions about our plan or our recommendations, please do not hesitate to contact me.

Sincerely,

Access Dental Plan/Premier Access Insurance Co.

A handwritten signature in cursive script that reads "Robin Muck".

Robin Muck

Senior Vice President, Strategic Programs

cc: Secretary Diana Dooley