

DHS Responses to Public Comments Regarding Transition of Dental Services

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Comment: Delta Dental of Arkansas (DDAR) is appreciative of the opportunity to publicly comment on DHS' amendment to the Arkansas Medicaid Children's Health Insurance Program (CHIP) State Plan.

Delta Dental of Arkansas is honored to have supported the Healthy Smiles Dental Managed Care Program in Arkansas since its inception in 2018, partnering with DHS to serve as one of the two dental managed care organizations serving the Medicaid population. As the leading dental insurer in the state of Arkansas, the Healthy Smiles Dental Managed Care Program is an extension of our mission to improve the oral health of all Arkansans by serving our state through our work with our members, providers, and partner organizations.

Delta Dental of Arkansas is proud of the impact the Healthy Smiles Dental Managed Care Program had on access to care and providing Medicaid beneficiaries the oral care they need. Since 2018, Delta Dental of Arkansas has managed benefits for an average of 325,000 beneficiaries, with children comprising over 70% of our total enrollment. The organization handled over 2.2 million dental claims while acting as steward for the program and DHS through above-and-beyond outreach, education, and community service for our beneficiaries. The Dental Managed Care Program successfully navigated the challenges of the COVID-19 pandemic and Public Health Emergency, supporting DHS during record high enrollment and throughout the redetermination process since 2023.

Overall, the Dental Managed Care Program in Arkansas was successful, especially in driving improved dental health outcomes for child beneficiaries. Notably, utilization of dental services outpaced national Medicaid and commercial averages, increasing by 9% since the beginning of Dental Managed Care Program compared to -5% for national Medicaid.

According to CMS, utilization rates across all core categories of care, Arkansas' national ranking improved since 2019, with the state's ranking rising from 47th to 13th overall. Delta Dental of Arkansas is proud to have supported DHS in achieving these care improvements, as both organizations leveraged their respective expertise to promote utilization of necessary oral health care.

As DHS undergoes the transition from managed care to fee-for-service, we encourage that patients and providers remain the priority for the state and the dental Medicaid program going forward. Medicaid beneficiaries are among the state's most vulnerable, and the fee-for-service program and associated processes must ensure their oral health needs are met without undue burden or complexity. We hope that enrollment, provider credentialing, and other core functions are seamlessly implemented, and that the state continues to prioritize increasing utilization of quality dental care despite the impacts of the change to a fee-for-service model.

While Delta Dental of Arkansas is disappointed in the decision to return the state to a fee-for-service model in November 2024, our organization continues to fulfill our contract requirements and stands ready to support any future opportunities to serve this important Program. We thank all our partners,

providers, and beneficiaries who entrusted their oral health care in Delta Dental of Arkansas and look forward to continuing our role as dental champions in Arkansas.

Response: The Department of Human Services appreciates the feedback from Delta Dental of Arkansas to its proposed amendment to the Arkansas Medicaid Children’s Health Insurance Program (CHIP) State Plan. DHS appreciates Delta Dental’s partnership in the Healthy Smiles program and its continued cooperation and assistance as Arkansas Medicaid transitions from offering dental services through a managed care model to traditional fee for service. Further we appreciate the services Delta Dental provided for its Medicaid beneficiaries and for helping them navigate dental services even through the COVID-19 pandemic that began in 2020.

We would like to clarify the statistics Delta Dental offered in its public comment and provide some additional context. We believe Delta Dental is relying on data collected by CMS to monitor state Medicaid programs’ Early and Periodic Screening Diagnostic, and Treatment (EPSDT) services for children. CMS develops the EPSDT report by pulling data from Arkansas Medicaid’s data system. The data for 2018 appears to be an anomaly, perhaps due to the change in our claims system newly receiving data from Delta Dental and MCNA, rather than relying on traditional Medicaid claims data. Excluding 2018, it’s clear there has been little improvement over time in the children’s utilization of dental services (percent of eligible beneficiaries who received any dental services).

	2017	2018	2019	2020	2021
US	50%	50%	50%	42%	45%
AR	49%	41%	50%	44%	49%

While Arkansas’s state ranking may have improved due to the 2018 data anomaly and the circumstances in other states, our results have not trended upward.

Adult utilization of dental preventive services does not appear to have improved either. The table below shows the results reported annually by each dental managed care organization to Medicaid’s independent reviewer.

	2019	2020	2021	2022
Delta Dental	12.8%	9.8%	11.1%	10.2%
MCNA	11.2%	9.1%	8.9%	8.5%

Arkansas Medicaid must serve as a good fiscal steward of the limited dollars the state has and ensure spending for dental services results in improved care. We understand the move to fee for service may present some operational challenges, as all change does, but we are working tirelessly to ensure a smooth transition that ultimately benefits our beneficiaries, dental providers and Arkansas taxpayers.