



July 31, 2018

Commissioner's Office
Department for Medicaid Services, 6W-A
275 E. Main Street
Frankfort, Kentucky 40621

To whom it may concern,

The National Association of Dental Plans (NADP) is providing comments on the "Adult Group 07 2018 Alternative Benefit Plan," released by the Kentucky Cabinet for Health and Family Services (CHFS), Department for Medicaid Services (DMS) on June 30, 2018.

For reasons described in this letter, we have strong concerns regarding the Department's decision to cut Medicaid dental benefits for approximately 460,000 beneficiaries who had been placed in the Alternative Benefit Plan.

While we understand there may be an effort underway to restore some benefits on a temporary basis, the abrupt action in this case has the potential to significantly impact the oral and overall health of a vulnerable population and increase costs to the overall Medicaid program. Any future action must be informed by important facts about dental care and oral health, which is key to overall health.

A growing body of research shows that access to dental treatment improves overall health and decreases the cost of medical care particularly for adults with periodontal disease.

For State Medicaid programs, access to dental services presents an opportunity to provide both better care for the enrollees and potentially reduce the financial impact of Medicaid funding. Data from a recent Medical Expenditure Panel Survey (MEPS) shows that when a preventive dental benefit was provided for adult Medicaid recipients in 2014, medical costs for patients with seven chronic conditions were lowered from 31 to 67 percent.¹

The results of this analysis suggest that policies and programs within Medicaid that encourage recipients to receive preventive dental care have the potential to dramatically reduce the health care costs associated with these conditions.

Without preventive dental services provided as a benefit to adult Medicaid recipients, there is a potential for higher health costs as patients lack an important component of

¹ National Association of Dental Plans. (2017, November 23). NADP Analysis Shows Adults with Medicaid Preventive Dental Benefits Have Lower Medical Costs for Chronic Conditions [Press release]. Available from: <http://bit.ly/2APegde>

National Association of Dental Plans

12700 Park Central Drive • Suite 400 • Dallas, Texas 75251
972.458.6998 • 972.458.2258 [fax]

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their health care needs. Not only are health costs increased for the chronic conditions identified by this analysis, but Medicaid patients without dental care are more likely to visit hospital emergency rooms rather than lower cost community health centers or private offices.

From 2000 to 2010 emergency room visits for dental issues doubled. A 2015 American Dental Association Health Policy Institute Research Brief found that emergency department visits due to dental conditions continued to increase with a system cost of \$1.6 billion in 2012.² The share of this cost paid by Medicaid also increased in 2012. Estimates indicate that 79 percent of these visits were by patients in need of prescriptions for pain medication or antibiotics for infection. The 2012 increase was primarily for adults over the age 25 as dental care for children through age 25 can be maintained on parents' dental coverage. Thus, a provision of adult dental preventive services in Medicaid can also reduce this funding for emergency room visits.

For children, dental treatment is key to stemming tooth decay, the primary chronic disease for children, which is recognized by inclusion in the Early and Periodic Screening, Diagnostic and Treatment (EPSDT) benefits. Thus, we are also concerned by reports that the technical implementation of this change disrupted dental services for children and other enrollees exempt from the Alternative Benefit Program.

- **Recommendation:** reinstate access to dental services for Medicaid enrollees placed in the Alternative Benefit Program and those who are exempt as quickly as is feasible to ensure continuity of care and treatment of critical oral and chronic health conditions.

NADP appreciates the opportunity to provide our concerns. In addition to these comments, we have attached our Kentucky Dental State Fact Sheet for your reference. Please feel free to contact me with any questions at 972.458.6998x111 or eaugustini@nadp.org.

Sincerely,



Eme Augustini
Director of Government Relations
eaugustini@nadp.org; (972) 458-6998 ext. 111

NADP Description: NADP is the largest non-profit trade association focused exclusively on the dental benefits industry. NADP's members provide dental HMO, dental PPO, dental Indemnity and discount dental products to more than 195 million Americans with dental benefits. Our members include the entire spectrum of dental carriers: companies that provide both medical and dental coverage, companies that provide only dental coverage, major national carriers, regional, and single state companies, as well as companies organized as non-profit plans.

² Wall, T., Vujicic M. Emergency Department Use for Dental Conditions Continues to Increase. Health Policy Institute Research Brief. American Dental Association. April 2015. Available from: <http://bit.ly/2Lm5wNX>

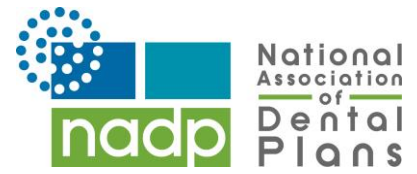
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12700 Park Central Drive • Suite 400 • Dallas, Texas 75251
972.458.6998 • 972.458.2258 [fax]

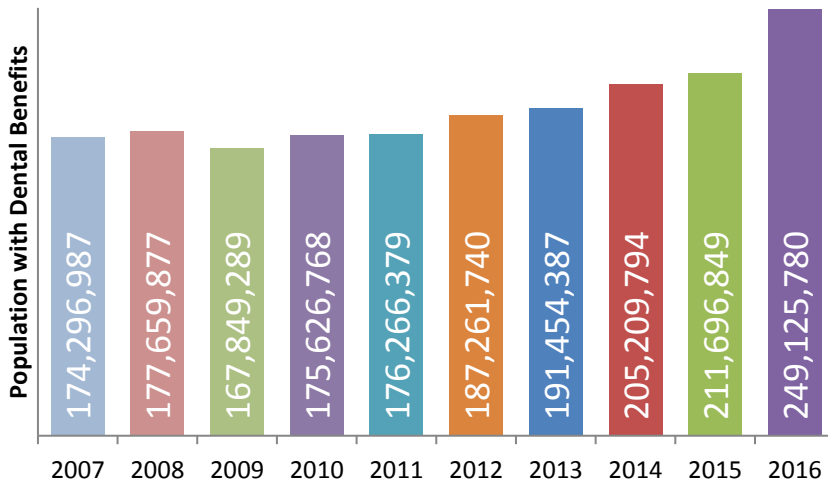


Kentucky

Dental Benefits Fact Sheet



National Enrollment Trends



Source: 2017 NADP Dental Benefits Report on Enrollment

State Enrollment Trends

An estimated 3,385,006 or 76% of the Kentucky population have dental benefits compared to 77% of the population nationally.

Plan Type	Enrollment
Private Plans	
DHMO	134,492
DPPO	1,778,288
Indemnity	80,515
Other Private	36,332
Public Plans	
Medicaid/CHIP	1,355,380

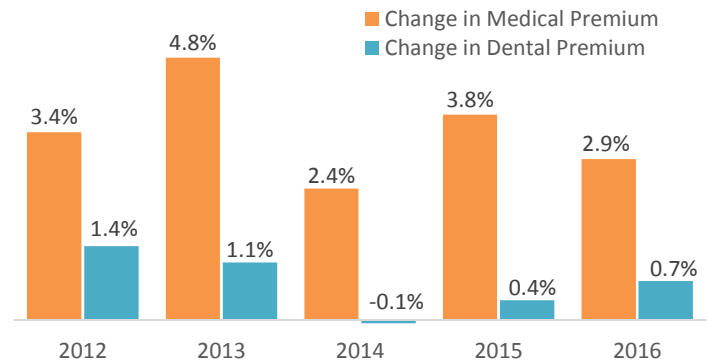
Source: 2017 NADP Dental Benefits Report on Enrollment

Distribution of Commercial Benefits: State v National

	DHMO	DPPO	Indemnity	Other
Kentucky	6.6%	87.6%	4.0%	1.8%
National	6.9%	81.1%	6.4%	5%

Source: 2017 NADP Dental Benefits Report on Enrollment

National Change in Premium



Source: NADP 2013-2016 Dental Benefits Report: Premium and Benefit Utilization Trends and 2017 NADP Survey of Members

State Workforce

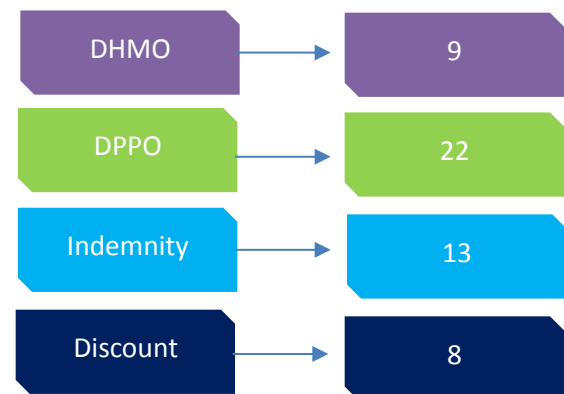
The federal standard for an adequate supply of dentists is 3.33 practicing dentists per 10,000 population. The table presents the number of dentists participating on provider networks in Kentucky including the number of network dentists per 10,000 population.

Network Type	Total Dentist	General Dentists	Pediatric Dentists	Specialists	Per 10,000
DHMO	1,361	1,076	55	230	3.1
DPPO	4,082	3,080	179	823	9.2

Source: 2017 NADP Dental Benefits Report: Network Administration & Network Statistics

Kentucky NADP Members

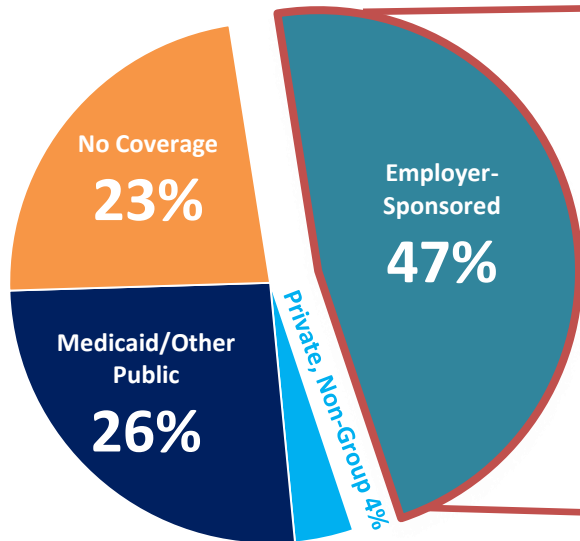
Plan Types Offered by NADP Members



Source: 2017 NADP Membership Directory

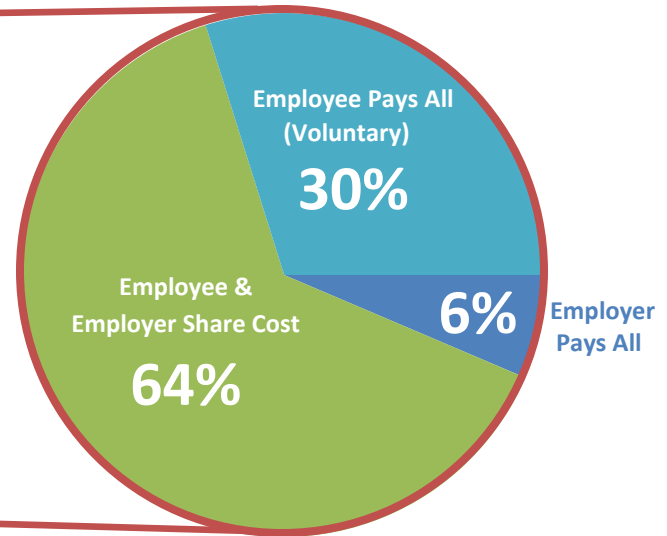
National Dental Benefits

Sources of Dental Coverage



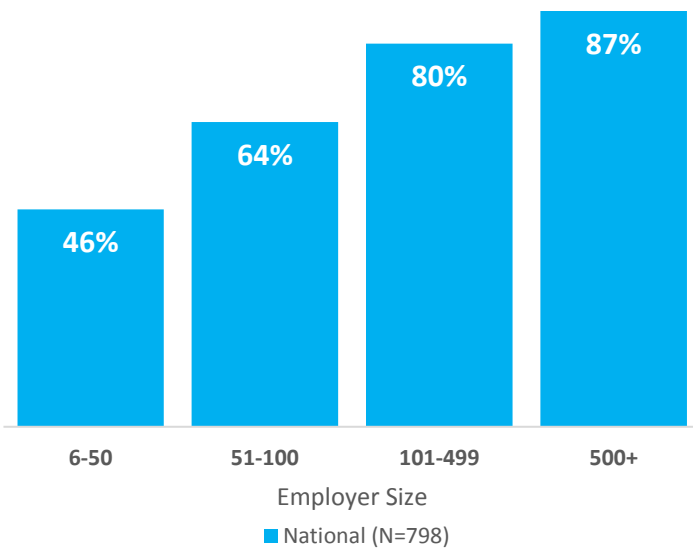
Source: 2017 NADP Dental Benefits Report on Enrollment

Group Policy Funding



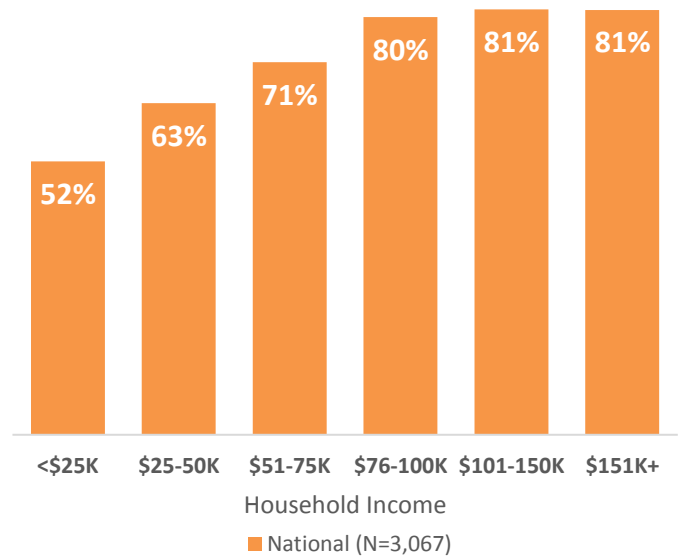
Source: 2017 NADP Survey of Employers

Employers Offering Dental by Employer Size



Source: 2017 NADP Survey of Employers

Consumers with Dental by Household Income



Source: 2017 NADP Survey of Consumers

About NADP



The National Association of Dental Plans (NADP), a nonprofit corporation with headquarters in Dallas, Texas, is the "representative and recognized resource of the dental benefits industry." NADP is the only national trade organization that includes the full spectrum of dental benefits companies operating in the United States. NADP's members provide dental benefits to more than 195 million Americans.