

August 27, 2015

Pedro Nava
Chairman, Little Hoover Commission
925 L Street, Suite 805
Sacramento, CA, 95814

Re: Recommendations to improve California's Denti-Cal program

Dear Mr. Nava:

The Association of Regional Center Agencies (ARCA) represents the community-based network of regional centers which provides lifelong services to over 280,000 individuals with developmental disabilities in California, most of whom rely on Medi-Cal and Denti-Cal to meet their dental care needs. Many of them exhibit a variety of behavioral issues, anxieties, or complex medical conditions that make them unlikely candidates for chair side or regular dentistry care. Their dental needs are oftentimes more severe than the average population due to a variety of factors. ARCA appreciates the opportunity to provide recommendations to the commission on how to reduce "red tape" and increase provider participation.

Reduction of "red tape" within the system

- There is a need to acknowledge the unique dental needs of individuals with developmental disabilities. Some of their diagnoses may render them incapable of tolerating any dental procedures resulting in poor oral care. The restrictive benefits allowed in the program are less than the standard of care for some of these patients. One deep cleaning every two years or not allowing a periodontal maintenance after a deep cleaning is not responsive to their complex needs. ARCA recommends that the standard benefit limits be flexible enough to accommodate their needs.
- Denti-Cal has a history of preauthorizing procedures but later denying coverage for technical reasons. The billing process is complicated and creates confusion among providers and patients. There is a need to streamline this process to make it transparent and easy to navigate by dental office staff and families. Preauthorization process should allow photo documentation as alternative to x-rays which are not always possible for the developmentally disabled population.
- Downgrading recommended treatment proposals is problematic when there is a clinical need for the service recommended by the dentist. The review process should acknowledge that addressing a dental problem more fully upfront may prevent the need for further procedures.
- Residents of Intermediate Care Facility (ICF) and Skilled Nursing Facility (SNF) receive enhanced services compared to those who reside outside of these settings. Individuals with developmental disabilities should receive needed services regardless of living arrangement.
- Proposed treatment authorization requests (TARs) for IV sedation and general anesthesia procedures need to be improved, such as examining the feasibility of utilizing existing medical documentation to establish the need for this service and funding dental clinics for time spent on gathering and reviewing medical histories and monitoring patients afterwards.

- Denti-Cal eligibility can be determined online but the status of the TAR approvals can only be obtained by calling the Medi-Cal office. Denti-Cal should establish an online tracking system similar to what is currently offered by most insurance companies to provide this information.
- The telephone system often requires several transfers before being connected to the appropriate person. A category specific directory (i.e., sedation services, specialty services) would facilitate better communication access.
- Some prospective providers have been told that the average wait time for approval to become a dental provider in the Denti-Cal program is 3-6 months. Efforts should be made to streamline the process.
- To increase efficiency, a standard claim form should be utilized instead of a Denti-Cal claim forms and TARs. The form should identify individuals with developmental disabilities to help Denti-Cal reviewers in the decision-making process.
- There needs to be a regional center liaison within the Denti-Cal system to assist with issues specific to the dental needs of individuals with developmental disabilities. Professionals within Denti-Cal should study and understand the challenges of providing dental treatment to and maintaining oral health in this population.

Making the program more attractive to providers

- There is a pressing need to increase the Denti-Cal rates to attract dentists and specialists. The rates have not been increased since 2001 and prices of dental supplies and laboratory fees have significantly increased since then. The fees are low and many providers do not find it sustainable to be a Denti-Cal provider.
- Allow Denti-Cal funding for IV sedation and general anesthesia dental services in the office setting for appropriate and less complex cases. It will reduce wait times due to limited operating room availability and will significantly reduce the costs of the procedures and increase the willingness of providers to participate in the program.
- Allow funding for behavior management or desensitization, oral hygiene instructions and nutritional counseling. These services take time but are effective in preventing further gum diseases and decay.
- To reach the unserved and hard to reach populations, Denti-Cal should allow the use of teledentistry as a service modality. A recent project through the University of the Pacific demonstrated the effectiveness of this.
- The requirement of having x-rays sent with claim forms for minor restorative procedures such as fillings is time consuming and expensive for the dental offices. This practice should be eliminated as it discourages dentists from maintaining their provider affiliation.

Thank you for the opportunity to provide recommendations. The Denti-Cal program is an essential part of the systems of care for people with developmental disabilities. Ensuring that there is access to needed routine and specialty services is promoting the general health of these vulnerable populations. Should you have any questions regarding these recommendations, please don't hesitate to contact Helen Thomas in our office at hthomas@arcanet.org or 916-446-7961.

Sincerely,

//s//

Eileen Richey
Executive Director

cc: Santi Rogers, Director, Department of Developmental Services