

Oregon Health Authority  
Jesse Anderson, State Plan Manager  
500 Summer St NE, E35  
Salem, OR 97301  
Delivered via e-mail

November 14, 2018

Dear Mr. Anderson:

Thank you for the opportunity to provide comment on OHA's proposed dental incentive program, which aims to increase access to preventive dental care for Oregon Medicaid fee-for-service (FFS members). This is a laudable goal, one which the Oregon Dental Association (ODA) fully supports. The ODA wishes to convey our deepest appreciation for OHA's time and energy which have been focused on the creation of this program. While the proposed program unfortunately does not ultimately create a scenario where our providers can financially break-even providing care to FFS patients, every little bit makes a difference and is sincerely appreciated.

As OHA indicates in the proposal, there are only 49 dental providers routinely billing for services to members under the FFS system. We believe this number is low based on a variety of factors from low provider reimbursement rates to administrative complication of claims processing. The harsh reality is that Oregon rates in the bottom of reimbursement levels compared with the rest of the country. In fact, as of 2016 data, Oregon tied for worst in the country in terms of Medicaid fee-for-service reimbursement as a percentage of private dental insurance reimbursement for children's dental services.<sup>1</sup> While this data does not reflect the 10% increase in certain services as of February 1, 2018, we do not expect that limited fee increase to change Oregon's rank substantially.

Further exemplifying the need to re-think how dentists participate in the FFS Medicaid program, is that fact that countless ODA members end up offering their services to Medicaid patients free-of-charge because it is more time and cost effective to provide charity care than to participate in the Medicaid system.

If Oregon truly wants to meet the needs of its FFS Medicaid population, we encourage you to use this program as only a launching point to establish true rate reform. Creative solutions to billing and administrative simplification are necessary. Oregon dentists are ready and willing to serve more Medicaid patients and we look forward to working with the Oregon Health Authority on new creative opportunities. We extend our appreciation for this very small step and look forward to a bigger leap together in the very near future.

Sincerely,



Jennifer Lewis-Goff  
ODA Government Affairs Director

<sup>1</sup> Gupta, N., MD., MPH., Ph.D.; Yarbrough, C., M.P.P.; Vujcic, Ph.D.; Blatz, A., M.S., Harrison, B., M.A. (April 2017). Medicaid Fee-For-Service Reimbursement Rates for Child and Adult Dental Care Services for all States, 2016. Health Policy Institute, American Dental Association. Retrieved from [https://www.ada.org/~media/ADA/Science%20and%20Research/HPI/Files/HPIBrief\\_0417\\_1.pdf](https://www.ada.org/~media/ADA/Science%20and%20Research/HPI/Files/HPIBrief_0417_1.pdf)