

CommunityDental Services

March 13, 2012

TO: Toby Douglas
Director Department of Health Care Services

FROM: Community Dental Services (CDS)
Debbie Zambrzuski (Director, Plan Operations)

SUBJECT: Response to Medi-Cal Dental Managed Dental Care
List of Immediate Action Expectations

As requested, below is the response from CDS to the list of Immediate Action Expectations as listed in your letter dated March 7, 2012.

Beneficiary letter

Plans are expected to develop and distribute a beneficiary letter that provides information on the benefits available.

CDS response: CDS will develop and distribute a beneficiary letter that provides information on the benefits available, including importance of care for children, and information on their assigned primary care dentist, including office location and telephone number.

However, we are requesting the department to provide additional information and guidelines on coordinating efforts with First 5 Commission relative to the letter for 0-5 year old members.

Estimated Completion Date: May 31, 2012 (barring any delays in coordinating efforts with the First 5 Commission).

Phone Call Campaign

Plans are expected to conduct a phone call campaign to beneficiaries who have not been seen by their primary care dentist in the last year.

CDS response: In collaboration with the network providers who are assigned the care of CDS' members, the Plan is developing a plan whereby members who have not been treated by his or her primary care dentist in the last year are contacted and reminded that care is available at his or her assigned dentist. After carefully developing a detailed policy and filing it with the California Department of Managed Health Care for approval, CDS will commence the call campaign. CDS intends to file the policy related to the call campaign by April 30, 2012, and, depending on the approval of the DMHC, implement the policy shortly thereafter.

Estimated Completion Date: July 1, 2012

Issue Resolution Reporting

Plans are expected to have an issue resolution process.

CDS response: CDS currently has in place a proactive Resolution Process when Member Services line receives a GMC beneficiary phone call. CDS provides expeditious review and resolution to a beneficiary's clinical and non-clinical concerns. CDS tracks and identifies systemic beneficiary concerns to reduce repeated similar complaints. All processes conform to the guidelines as specified in the Knox-Keene Act.

Estimated Completion Date: Process currently in place.

Informational Flyer

Plans are expected to work together to develop an Informational Flyer.

CDS response: CDS will work with other Plans to develop an Informational Flyer that can be distributed to Plan members.

However, the scope and size of this expectation requires additional details which are not currently specified in the letter received by CDS. These include identification of all the stakeholders and advocates via whom this information is to be distributed. In addition the letter does not clarify how efforts will be coordinated amongst all the plans to develop the Informational Flyer and under whose supervision.

Estimated Completion Date: TBD based upon additional information and guidance from the Department.

Utilization Control with Enrollment

Plans are expected to review provider encounter data to identify beneficiaries that have not been seen in their dental office in a year and halt new enrollments for providers who do not meet certain thresholds.

CDS response: CDS does not agree with this directive since this expectation may result in a reduction in the GMC network providers and offices. In addition, it also potentially places undue hardship on new beneficiaries who may have to travel extended distances in order to access a provider office. Furthermore, the letter does not define any parameters for setting the utilization thresholds, does not state who is responsible for creating and defining these thresholds, and does not specify if these thresholds will apply consistently to all plans. Without further clarification from the Department, CDS will not be implementing this directive.

Estimated Completion Date: Not applicable

Education Seminars

Plans are expected to conduct educational seminars for both providers and providers' staff.

CDS response: CDS will utilize its current Provider Bulletins for educating providers and their staff on the various topics as specified in the letter. This includes the provider obligations to treat assigned members, beneficiary EOC, submission of encounter data, information regarding benefits, etc. These Provider Bulletins will be distributed twice every calendar year.

Estimated Completion Date: July 1, 2012

Pay to Perform

Plans are expected to have an incentive program for providers.

CDS response: CDS has implemented an incentive program for providers to help encourage increased beneficiary access and for providing important diagnostic and preventive services to children and pregnant women. CDS provides added compensations to providers who perform comprehensive diagnostic examinations, preventive prophylactic procedures, and specified oral surgery and endodontic procedures. CDS also provides provider compensation for limited emergency extractions for beneficiaries 21 years and above.

Estimated Completion Date: Currently in place

Withholds of Provider Payment

Plans are expected to implement withholds from providers in association with minimum thresholds for utilization established by Plans.

CDS response: CDS monitors provider utilization very closely and does send corrective action letters to providers who do not meet certain clinical benchmarks. CDS also provides added compensation to providers who perform certain procedures which indirectly incentivizes providers to submit encounter data.

Without additional clarifications from the Department regarding parameters for setting utilization thresholds, CDS will not withhold provider compensation as currently directed in the letter. Please note that the current contract CDS has in place with DHCS and with its providers does not specify any such requirement.

Estimated Completion Date: Not applicable

Federally Qualified Health Centers

Plans should conduct concentrated outreach to Federally Qualified Health Centers (FQHC's) and work to enroll them as providers

CDS response: CDS invites all licensed and fully credentialed dentists to participate in its network. CDS' desire is to have a fully-robust network of dental providers from which its membership can select from relative to dental care. Given FQHC's unique relationship with the underserved, CDS will direct its provider relations staff to focus

network development to all qualified, dental FQHCs. In fact, CDS will immediately survey the FQHCs in Sacramento and Los Angeles Counties and begin a dialogue relative to qualifying them to participate in the CDS network.

Estimated Completion Date: July 1, 2012

Timely Access Reports

Plans are expected to submit annual timely access reports.

CDS response: CDS does have in place quarterly querying of all providers to ensure compliance with timelines for initial, on-going, emergency and routine requests for general and specialty services that are in compliance with the current GMC Access and Availability benchmarks as listed in the current CDS contract 07-65803. CDS has completed this report for 2011 calendar year and will start submitting this to the Department on an annual basis.

Estimated Completion Date: Currently in place

Increase Provider and Specialty Enrollment

Plans and the Department will work together to establish credentialing criteria that will be used by Plans to enroll potential providers without enrolling into the fee for service program.

CDS response: CDS has in place a network of Specialists to provide access to GMC beneficiaries and General Dentist providers access that meets the Department's access benchmarks for services. CDS does not currently anticipate the need for additional Specialists as the current enrollment size of CDS assigned GMC beneficiaries have timely access that meet the timelines and distance traveled to assure treatment.

Estimated Completion Date: Currently in place.

Specialty Referral Process:

Each Plan is expected to work with the Department and other Plans to develop a streamlined specialty referral process that will be uniform across all DMC Plans.

CDS response: CDS currently has as specialty referral process in place. However, CDS will be happy to work with the Department and other Plans to implement a uniform specialty referral process that is further streamlined.

CDS will await additional information from the Department as to who will take the lead to coordinate and implement the development of a streamlined uniformed GMC specialty referral process amongst all GMC Plans and the Department.

Estimated Completion Date: TBD based upon further clarification provided by the Department.