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*“Mississippi Dentists Care”*

Dr. David Dzielak, Executive Director  
Office of the Governor, Division of Medicaid  
Sillers Building, 550 High Street, Suite 1000  
Jackson, MS 39201-1399

February 29, 2016

RE: Support of SPA 16-0006 Dental and Orthodontic Reimbursement

Dear Dr. Dzielak and Others:

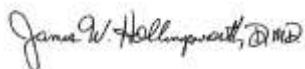
On behalf of the Mississippi Dental Association (MDA), we are providing this letter to communicate our support of the Mississippi Division of Medicaid State Plan Amendment 16-0006 regarding dental and orthodontic reimbursement. This amendment is proposed to go into effect on July 1, 2016.

The Mississippi Division of Medicaid and the Mississippi Dental Association have worked in collaboration to develop a dental and orthodontic reimbursement plan that will increase access to dental care for Mississippi Medicaid patients (recipients) and also increase Mississippi Medicaid dentist providers. There is mutual agreement that everyone benefits whenever oral health preventive care and also necessary dental treatment is provided and accessed by Medicaid patients. When this happens, overall health is improved along with oral health, dentists are able to care for patients in their respective communities and Mississippi policy makers and taxpayers can be confident in knowing that their tax dollars are being spent effectively and efficiently.

The Mississippi Dental Association is a nonprofit, professional member group organized in 1875 by the dentists in our state to collaboratively work toward the goal of optimal oral health care for all Mississippians. Our association is also affiliated with the American Dental Association through tripartite membership. Licensed dentists in Mississippi are not required to be members of the MDA; however, our association represents over 75% of the licensed, practicing dentists in our state. The mission of our association is to encourage the improvement of the oral health of the public; to enhance members' ability to provide care to the public through education, training and service; and to promote the science of dentistry. Therefore, we welcome this opportunity to provide our support of this dentist provider reimbursement plan in collaboration with the Mississippi Division of Medicaid as part of our organization's mission and work.

The MDA also wishes to sincerely thank the staff and leadership at our Mississippi Division of Medicaid for their genuine and dedicated effort through teamwork to accomplish this project outcome. Mississippi dentists care and are an important part of our state health care system that provides much needed oral health care for all Mississippians. We appreciate the ongoing state agency support that allows us to take care of all Mississippians.

Respectfully submitted,



MDA President, 2015-16



MDA Executive Director

# AUTUMN RIDGE DENTAL



DONALD Q. WEAVER, D.M.D.  
P. ADAM MIDDLETON, D.M.D.  
PAUL D. GUNDY, D.M.D.

Division of Medicaid  
Office of the Governor  
Office of Policy  
Walter Sillers Building  
Suite 1000, 550 High Street  
Jackson, Mississippi 39201

March 3, 2016

To whom it may concern:

Autumn Ridge Dental Partnership is **in support** of State Plan Amendment (SPA) 16-0006 Dental and Orthodontic Reimbursement.

Sincerely,

Paul D. Gundy, D.M. D.

P. Adam Middleton, D.M.D.

RECEIVED  
MAR -8 2016  
DIVISION OF MEDICAID  
MEDICAL SERVICES

## **Comments Received via Email for State Plan Amendment (SPA) 16-0006 Dental and Orthodontic Reimbursement**

March 1, 2016

I am very glad that the dental fees are being increased! I have been treating Medicaid patients for 37 years and will continue to see these patients and thankful to be getting a decent fee for treatment now!

Donald G Traxler, DMD

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March 1, 2016

I am in favor of this amendment. As a Medicaid provider this amendment is both necessary and appreciated. I do the best that I can to provide care for as many patients as I can, but the current reimbursement is not sufficient to sustain a private practice. Overhead cost is continuing to go up but reimbursement is not. Thank you for your consideration.

Andrea L. Davis, DDS

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March 2, 2016

Mrs. Wilson (sorry if I assumed wrong),

I fully support this amendment. I have been practicing for 25 years and I was a Medicaid provider early in my career. I quit because the reimbursement was so low I lost money every time I saw a patient. I am glad to help those in my community with less but I employees and bills that have to be paid if I see a patient. Medicaid can't expect dentists to lose money and maintain a business.

Thank you for your consideration,

Frank Conaway DMD

Bay St. Louis

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March 2, 2016

Dear Margaret,

I am writing in support of SPA 16-0006 Dental and Orthodontic Reimbursement! Thank you very much!

Daniel B. Story II, DMD

MS2202-85

5800 Ridgewood Road Suite 101

Jackson, MS. 39211

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March 2, 2016

I would like to offer my support for this reimbursement policy improvement. As Director of Government Relations for Benevis, the practice management company for Kool Smiles dental practices, I see the impact of Medicaid reimbursement policies around the country. The proposed policy would go a long way to enhancing provider enthusiasm for accepting

and providing quality dental care for Mississippians on Medicaid. The dental community has been overlooked for the statutorily required periodic reimbursement benchmarking for a long time. Additionally, the dental community has endured an additional 5 percent rate cut that should have sunset years ago, going back to Governor Barbour's administration. Other provider organizations were relieved of that temporary rate cut years ago.

Thank you for considering the research, interest and activism by the Mississippi Dental Association. They have been consistent and passionate about their dual concerns for the state's Medicaid dental providers and the Mississippi citizens that deserve improved access to quality dental providers. This is likely a win-win-win for the state, program beneficiaries and providers.

Please contact me if you have any questions.

Ronnie Coleman  
Benevis  
Director, Government Relations  
[513-702-1057](tel:513-702-1057)

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March 2, 2016

I think this plan is a great idea, and it would be great for our state.

Dr. Sam Ritter  
Saltillo, MS

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March 2, 2016

Dear Division of Medicaid,

As a dental specialist and Medicaid provider, I fully support the (SPA) 16-0006 Dental and Orthodontic Reimbursement plan. This joint effort between the MS Dental Asso and the MS Divi of Medicaid to identify a mechanism and benchmark on which to review and adjust reimbursements for dental and orthodontic services is much needed. By providing a fair fee schedule, this will increase the number of dentists accepting Medicaid patients. The increased number of dentists providing services to Medicaid patients will then benefit the Medicaid population by providing broader and easier access. I support this effort without reservations.

Sincerely,

E. Lee Engel, DMD,MS  
Engel Orthodontics  
843 S. Mains St.  
Greenville, MS 38701

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March 2, 2016

I am writing to wholeheartedly support the SPA proposal . It is the right thing to do for both the recipients and the providers. It is long overdue and I appreciate the work put into this amendment.

Dr. Hugh Smith Pediatric Dentist

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March 2, 2016

Mrs Wilson,

My name is Dr. Joseph E. Ruder II, DDS (license # MS-3450-04). I have dedicated my dental career to take care of the less fortunate and lower income residents of Mississippi. I am in favor of the State Plan Amendment (SPA). I support all the changes recommended in this amendment. Hopefully, these changes will encourage other dentists to sign up as Medicaid providers as these patients are in great need for more providers.

Over the past several months, the MDA has been working with the Mississippi Division of Medicaid to address dental fee reimbursement. The project has been multi-faceted in nature: identify a dental fee benchmark that could be reviewed annually in an effort to make reimbursement adjustments, increase Medicaid dental reimbursement to a fair level for dentist providers, increase the number of Mississippi dentists who serve as Medicaid providers and finally to address oral health disparities in our state.

We are pleased to announce we have worked out a plan with the Division and now we need your assistance. You may reference what is referred to as the state Amendment Plan (SPA) at this weblink: <http://www.medicaid.ms.gov/about/state-plan/public-notices/>

Click on - [State Plan Amendment \(SPA\) 16-0006 Dental and Orthodontic Reimbursement](#)

This SPA identifies a dental fee benchmark, the National Dental Advisory Service (NDAS), to be referenced annually for the purpose of adjusting dental reimbursement. (Note the Zip code referenced is the Jackson metro code – 39211).

The SPA also implements dental reimbursement starting at the 40th percentile of NDAS effective July 1, 2016 and increasing to the 70th percentile effective July 1, 2019.

Sincerely,

Joseph E. Ruder II, DDS

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March 3, 2016

Congratulations on this accomplishment. It is a great idea to use survey as a payment comparison. Please note that the cost of supplies, insurance, overhead, etc. are just as costly for me (in the 20<sup>th</sup> percentile) as they are for the dentists in the 80<sup>th</sup> percentile. This will go a long way toward the repair of the fouled reimbursement method we have now.

Thank you for your service.

Harry Goza Jr DDS

March 7, 2016  
TO WHOM IT MAY CONCERN,

We fully support STATE PLAN AMENDMENT 16-0006 DENTAL AND OTHODONTIC REIMBURSEMENT. Thank you for the opportunity to respond.

Sincerely,

Ronnie Harrison DMD

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March 7, 2016

The Mississippi Dental Association is in complete support of this. Thank you and those responsible for seeing that this has been done. It will help those in need greatly!

James Russell Dumas,Jr. DDS

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March 8, 2016

I would like voice my support for the SPA State Plan Amendment for Medicaid Dental reimbursement. Dental reimbursements from Medicaid have been extremely low for many years. I believe many Mississippi dentists are like me, choosing to treat as few Medicaid patients as possible because of these low reimbursements.

I have used the NDAS dental fee service for a number of years as a guide for setting my fees. I believe it would work very well for the State also.

Thank you so much for considering this change.

John A. Smith DDS  
Greenwood, MS

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March 9, 2016

Dear Dr. Dzielak,

SmartSmile Orthodontics (SSO) strongly supports State Plan Amendment (SPA) 16-0006 Dental and Orthodontic Reimbursement. Adopting the National Dental Advisory Service pricing program provides fair coding and fee methodology to all dental providers serving Medicaid beneficiaries. Additionally, SPA 16-0006 includes several other critical provisions which, cumulatively, create an amendment that will both help protect access to dental care for Medicaid recipients and incentivize dental practitioners to provide services to those most vulnerable. Given the vast inequities in dental care faced daily by Medicaid patients and dental providers, SSO thanks you for your commitment to this amendment. Sincerely,

Dr. Britton Montgomery, DMD, MSD  
SmartSmile Orthodontics, PLLC  
7724 Old Canton Road  
Madison, MS 39110  
601.853.1307

March 10, 2016

Dear Division of Medicaid,

As a Medicaid provider, I fully support the (SPA) 16-0006 Dental and Orthodontic Reimbursement plan. I believe this joint effort between the MS Dental Association and MS Division of Medicaid is much needed to provide a fair fee schedule for those dentists willing to help the less fortunate.

Sincerely,

Julia Brandon,DMD  
Calhoun Family Dentistry

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March 16, 2016

Margaret Wilson,

The MDA has asked that we write a letter to express my support for the purposed change of dental fee reimbursement.

I would like to say i have been a Medicaid provider for many years, in the past i was able to deliver care to patients in my area who were on Medicaid. The majority of my patients are children, who I feel should be the major focus of Medicaid. The current rate of reimbursement of my fees is about 48% total , that is considering all procedures and the average reimbursement , some procedures a little more and some a little less, especially restorative, fillings etc.

My office overhead is 63-68% of my fees so as you can see i was not generating any profit on my work. I was able to help justify my loss of income in the past because i was able to contribute to Deferred Compensation to help with my retirement , but since the new Medicaid reimbursement system of MSCAN and insurance companies paying it is no longer eligible. The amount of straight Medicaid payment I receive now is almost nothing. In response, because I currently lose money on almost every Medicaid patient I see or at best break even , I no longer am taking new Medicaid patients . I continue to see my existing patients that I have seen over the years. I have also limited the amount of time i can devote to seeing the Medicaid patients. I do this only to try and make it less of loss for my practice so I can continue help with these children

When I heard that Medicaid, was going to use a benchmark for fees based on National Dental Advisory Service, it was a step in the right direction. The standardizing of fees and basing a percentile of national fees will help us in MS because we are in generally below the national average as you know.

If Medicaid and the legislature could get the Deferred Comp back on Medicaid would also be a great incentive for dentist to become and remain a Medicaid provider.

In closing I would like to thank you for efforts to help raise the fees we dentist receive to hopefully a level that we can continue to deliver dental care to the children of the

state who desperately need our help. I am a firm believer that Mississippi doesn't necessarily have a access to care issue as much as it has low number of dentist providing care for Medicaid. This is directly due to extremely low level of reimbursement of fees.

Thanks for your help,

James A. Bounds DMD  
*Tony Bounds*

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March 28, 2016

Dear Ms. Wilson,

I am writing in response to the State Plan Amendment (SPS) 16-0006 Dental and Orthodontic Reimbursement. I am in full support of this plan. I graduated dental school about 5 years ago and accumulated over 130,000 dollars in student debt. For the past 5 years, I have been accepting Medicaid patients. I took part in Mississippi's Dentist Loan Repayment Program (MORHPC DLRP). This program paid back 40,000 dollars' worth of my loans in return for treating Medicaid patients for 3 years. I have just finished my obligation to the program. While this program helped significantly, financially I have been questioning my ability to continue to treat these patients. it is extremely difficult repaying the remaining loans and treating Medicaid patients with the current reimbursement. With this proposed fee increase, it will allow me to continue to treat Medicaid patients.

Thanks,  
Jenny Shutt

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March 26, 2016

Ms. Wilson,

I am emailing to let you know about my support for State Plan Amendment (SPA) 16-0006 Dental and Orthodontic Reimbursement. As a dentist who has been in practice for over sixteen years, it has become very difficult to treat Medicaid patients. I believe the last reimbursement increase for dentists was about 1999, even though the number of Mississippi residents who qualify for Medicaid has increased over this time. Supplies, rent, and other expenses have increased over this time. My staff expects to be able to receive some sort of pay increase every year and I have been able to give them an increase most years in able to at least keep up with the cost of living. These increased expenses, coupled with no reimbursement increase, has forced me to consider the alternative of not accepting Medicaid patients. Fortunately, this proposed fee increase will allow me to continue to treat this most vulnerable group. I believe this increased fee schedule is fair and it will increase the number of dentists who will accept Medicaid therefore decreasing the distance these citizens have to travel for care. This is truly a win-win for everyone.

Thanks,  
Brant Kairit  
Senatobia Dental Care, P.C.