

July 1, 2020

The Honorable Alex Azar
Secretary
Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Dear Secretary Azar:

On behalf of our 163,000 members, the American Dental Association (ADA) is writing to thank the Department of Health and Human Services (HHS) for its continued strong support of dentists across the country during this public health emergency and to request guidance for providers now finding themselves ineligible for payments from the Medicaid Targeted Distribution of the Provider Relief Fund because they previously received small payments from the General Distribution.

The ADA believes that Medicaid plays an essential role in a state's oral health care safety net and our association is committed to ensuring that families have access to comprehensive and affordable oral health care coverage. Medicaid and the Children's Health Insurance Program (CHIP) provide vital coverage to over 70 million Americans, including almost 35 million children.¹ About 7.4% of all adults and 38.5% of all children in the U.S. have dental coverage under Medicaid.²

We are grateful the Targeted Medicaid Distribution from the Provider Relief Fund has allowed eligible dentists to begin submitting their applications for payments, however, we have also become aware of an unintended consequence created through the eligibility requirements of this distribution. There have been certain instances of automatic payments previously being sent from the General Distribution to dentists who may have in the past billed relatively small amounts to the Medicare program. Whether those small payments were previously accepted or rejected by the dentist would still preclude these dentists from submitting applications for the Targeted Medicaid Distribution, which is based on percentage of gross revenue. We believe in some cases this could create significant discrepancies for what these

¹ Medicaid.gov, [February 2020 Medicaid & CHIP Enrollment Data Highlights](#), February 2020.

² ADA, [Dental Benefits Coverage in the U.S.](#), November 2017.

dentists would have otherwise been eligible to apply for and receive from the Targeted Medicaid Distribution. We ask that HHS provide a pathway for these providers to be eligible for payment based on a percentage of gross revenue and provide more detailed guidance to these providers on how to navigate future eligibility and have these payments balance out.

Medicaid provider dentists treat the most vulnerable people in our nation, including children, the elderly, disabled, and pregnant women. Due to the public health emergency creating volatile financial situations, without assistance these dentists could begin disenrollment from the Medicaid program which will make it more difficult for Medicaid patients to access needed oral health care. Earlier this month, the ADA's Health Policy Institute (HPI) surveyed Medicaid provider dentists and found that almost 20% of surveyed Medicaid provider dentists were not sure if they would continue to participate in Medicaid by the end of June. This number could grow in the months ahead as uncertainty looms.

[If an enrolled Medicaid provider] Looking ahead, does your practice plan to continue to be an enrolled Medicaid provider at the end of this month?



● Yes [74%] ● No [7%] ● Not sure [19%]

We appreciate the working relationship HHS has fostered during this period and look forward to continued communication. Please contact David Linn at linnd@ada.org or (202) 789-5170 to facilitate any further discussions.

Sincerely,

Chad P. Gehani D.D.S.
Chad P. Gehani, D.D.S.
President

Kathleen T. O'Loughlin D.M.D. M.P.H.
Kathleen T. O'Loughlin, D.M.D., M.P.H.
Executive Director