

May 26, 2023

Trey Collins
Chief, Purchasing and Contract Administration
solicitation.questions@ahca.myflorida.com

Re: United Concordia Dental Response to the State of Florida Agency for Health Care Administration Request for Information (RFI) 014-22/23 Procurement of the Statewide Medicaid Prepaid Dental Program

Mr. Trey Collins:

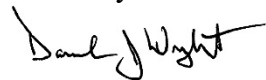
On May 15, the Agency for Health Care Administration (AHCA) released a request for information (RFI) to solicit concepts on innovations and best practices in delivering Medicaid managed care services from entities with direct experience providing dental services. We at United Concordia Dental appreciate the opportunity to provide feedback to the agency. Identifying leading practices and innovative approaches to providing dental managed care will ensure Florida recipients have access to a robust dental program that supports oral health, overall health, well-being, and quality of life.

United Concordia Dental is a leading national dental solution with over 50 years of experience that has improved the oral health of our members through affordable, high-quality dental care. We operate across all 50 states, D.C., and Puerto Rico serving over 9.5 million members through a global network of licensed dentists and health plan products. Focusing on enhancing total health, United Concordia Dental successfully operates Medicaid (including CHIP), Medicare, Medicare Advantage, TRICARE, and Affordable Care Act plans. United Concordia Dental is committed to remarkable customer experiences and boasts an AM Best "A" (Excellent) financial strength rating.

United Concordia Dental is submitting a response to AHCA's RFI to share our insights and best practices where our expertise may prove most valuable and in anticipation of the competitive procurement of Florida's Statewide Prepaid Dental program. With our expertise, we can provide quality and accessible oral health services for Florida's 4.8 million Medicaid recipients.

United Concordia Dental openly invites a continued discussion with AHCA on the dental managed care program and looks forward to working with AHCA on these initiatives. For questions related to our RFI response, please contact Daniel Wright at 717-329-7702 or daniel.wright@ucci.com. Eric Greiner is your alternate RFI contact and can be reached at 434-258-3557 or eric.greiner@ucci.com.

Sincerely



Daniel J. Wright
Chief Operating Officer
United Concordia Dental

ABOUT US

Our Operating Model

Several states have adopted innovative practice models, changed the scope of practice and practice settings of oral health professionals, and introduced new provider licensing rules to meet community oral health needs. A traditional dental services model of patients scheduling preventive dental services with their family dentist for two annual check-ups to prevent serious dental conditions is helpful but may not always be possible for Medicaid patients. Providers and MCOs must be flexible and innovative in adapting delivery given the dynamics (societal, cultural, financial, etc.) of today's Medicaid population.

Our operational model aims to effectively manage the enrollment, coverage, provider networks, member services, care coordination, claims processing, quality improvement, and compliance aspects of providing dental services to our members.

Enrollment: We have systems and processes to receive enrollment files from the state to ensure that services are not provided to individuals not enrolled in the program while ensuring those members entitled to benefits receive appropriate dental care.

Provider Network Management: We establish and maintain networks of dental providers, including general dentists, orthodontists, periodontists, endodontists, and maxillofacial surgeons. We constantly monitor network adequacy to ensure access to our members' covered services.

Member Services: Through our member services department, we address members' inquiries and help members navigate the dental care landscape by understanding benefit coverage and finding appropriate providers.

Care Management: Our care management program, aimed at optimizing the oral health of our members, includes case management for complex cases, promotion of preventive services, and coordination of care across multiple providers.

Claims Processing and Payment: We handle the processing and payment of claims submitted by dental providers for services rendered to our members, including assessing them for accuracy, adhering to coverage guidelines, and processing payments according to required accuracy and timeliness standards.

Utilization Management: Our utilization management processes ensure that dental services are necessary, appropriate, and cost-effective, which involves prior authorization requirements and retrospective utilization review to monitor and manage the utilization of dental care resources.

Quality Improvement: We employ quality improvement initiatives to monitor and enhance the quality of dental services delivered to our members, which includes performance measurement, data analysis, quality improvement programs, and collaboration with providers to achieve better outcomes and member satisfaction.

Compliance and Regulatory Requirements: We ensure compliance of various regulatory and legal requirements, such as state and federal laws, privacy regulations, and accreditation standards, through rigorous policies and procedures, regular monitoring, audits, and reporting.

Performance Metrics

Our corporate approach centers on the continuous improvement model, designed to collect and evaluate information regarding the quality of the healthcare processes used by United Concordia Dental and the health outcomes of its covered patients. Continuous improvement allows us to maintain high-quality dental delivery networks, identify problems in various areas of a participating provider's practice, offer solutions, and ensure efficient utilization. This concept incorporates problem identification, communication feedback, corrective action plans, and continual improvement monitoring.

Examples of metrics collected each quarter for our Medicaid operations include the following:

Phone Statistics

Service Level Agreement (% w/in 30 sec)
Average Speed of Answer (% w/in 30 sec)

Credentialing Compliance

Credentialed and % Compliant
Recredentialed and % Compliant

Claim Payment

% of clean claims in 30 days
% of clean claims in 90 days

Provider Access

of Dentists w/in 30 Miles of Membership
of Denied Authorizations

Utilization Management

Decision Rendered (% within ten days)
Decision Notification (% within 15 days)

Provider Appeals

Filed
Ruled in Favor of Provider

Quality of Care

of Cases Reported
% Ruled in Favor of Provider

Fraud and Abuse

of Investigations
Cleared

Quality Assessments

Our participating providers undergo quality assessments of their practices, which includes reviewing patient records and onsite visits to ensure compliance with our Dental Office Quality Standards. These evaluations foster an environment of information sharing and problem solving. We provide education and support to our providers on shared concerns and feedback.

Our approach to quality assessment includes evaluation, scoring, and provider notification of each provider's current and previous audit findings, including evaluating utilization patterns and grievance trends since the last audit. We record audit findings for trending, tracking, and reporting on individual providers and aggregate results. We monitor each provider's previous and current findings. All actions due on future dates are entered into a database as part of a "tickler" system to identify necessary actions when those actions become due.

Provider Network Requirements

Our Dental Network Service Representative will visit the provider's office and assess compliance with our Dental Office Quality Standards. Providers must complete a Practice Application, and each dentist in the practice must complete a Credentialing Application. Once a signed provider contract is in place, we will process it for approval by our Dental Oversight Credentialing Committee. Providers can only enroll members or treat patients once the committee approves, and individual clinicians can only treat once fully credentialed.

Credentialing

Maintaining quality provider networks is essential for delivering outstanding member services and offering an exceptional product. Provider credentialing is necessary to ensure quality. We use URAC and dental industry standards, client or business partner requirements, and relevant federal and state regulations for credentialing with a cycle time averaging 21 days or less.

Maximizing Communication and Resources

United Concordia Dental is committed to providing accurate and timely information for participating providers. The communication channels used to maximize communication and as resources for our provider and member networks are as follows.

Dental Professional Relations Representatives: We maintain a field staff of Dental Professional Relations Representatives dedicated exclusively to assisting dentists and their staff in understanding our dental programs and products, which can address policy questions, provide professional support, and offer information about our programs. Our representatives also visit dental offices to provide in-person support or resolve issues over the phone.

Government Business Operations Representatives: Our Government Business Operations Department consists of trained customer service personnel to assist with inquiries about our dental programs and products by email, online by completing the Contact Us form, or in writing to the Government Business Operations Department.

Dental Reference Guide: The Dental Reference Guide provides dental network offices with information on plan options and participation policies.

Newsletter: Our newsletter includes information on new or revised dental policies and procedures, guidelines for accurate and timely claims submission, new benefits and guidelines, and corporate updates. The newsletter is emailed to all providers and is available on our website.

Special Mailings: Special mailings inform dental offices of significant changes in coverage, claim payment policies, or procedures. They include responses to frequent provider inquiries on specific topics and detailed information.

United Concordia Dental Website: Our website (www.unitedconcordia.com) provides detailed information about our customers, corporate news, automated services, press releases, and member-specific information. For convenience and accessibility, the website is secure and optimized for mobile devices. Members can check eligibility in real-time, schedule appointments, access records of all completed dental care, receive secure communications like appointment reminders (scheduled and needed), promote wellness, and more. Other member features include program information such as dental benefit details, an ADA-approved provider claim form, new online educational materials, and interactive training. Members can quickly contact us through our communication center via phone, text, email, or chat. We also have an interactive provider directory called *Find a Dentist*, where you can search for providers who accept new patients and get details such as their specialty, languages spoken, gender, address, phone, and fax numbers.

Targeted Provider Outreach and Education: Used to distribute information on best practices and processes. For example, certain Medicaid programs have a Benefit Limit Exception (BLE)

process required so adults can access additional benefits not offered by the state. To reduce administrative denials due to inaccurate partial information needed from providers, we focused on providers with high volume and repeat denials through an education campaign about BLE process improvement, resulting in five consecutive quarters of reduced BLE denials and improved member and provider satisfaction.

[Integration with Florida Health Care Connections \(F.X.\) Project and the Federal Centers for Medicare and Medicaid Services Interoperability Rule](#)

The Florida Health Care Connections (F.X.) Project "seeks to build better connections to relevant data sources and programs and improve healthcare options and outcomes" and "to enhance the provider and recipient experience, improve access to healthcare data, and enhance data integration between State of Florida agencies." One Interoperability Rule feature relates to provider data and claims inquiry information availability. Our online member portal, "My Dental Benefits," allows access to claims information. Provider data is available in United Concordia Dental's directory or through our partner MCOs to comply with interoperability mandates.

Examples of United Concordia Dental's engagement in similar activities for other Medicaid states include the 21st Century Cures Act provider data initiatives to solidify our provider portal as the primary source for contracting information. We worked with providers on a registration campaign to capture Medicaid contracting data at a single source and with the state on weekly provider data feeds (both inbound and outbound) to align provider data.

Another example is a Medicaid daily claims accumulation file exchange process we utilize. United Concordia Dental transmits a daily dental claims accumulation file to the state to ensure providers have real-time patient claim accumulation information. The state stores and combines it with all Medicaid MCO accumulation information. United Concordia Dental then receives a daily inbound file from the state, and stores total patient accumulation information, including other MCO accumulation info, to capture annual dental benefit information and minimize timing issues before adjudication. As members move from one MCO to another, having this combined claim accumulation information helps providers confirm the benefit levels of Medicaid patients and minimize denied pre-authorizations/claims resulting from timing differences.

INNOVATIVE IDEAS AND BEST PRACTICES

Based on our experience, United Concordia Dental offers AHCA the following innovations and best practices for consideration for the RFI areas below.

1. Improve dental and primary care services integration for children, adolescents, pregnant women, and the elderly.

At United Concordia Dental, we understand that oral wellness is integral to overall health. We know that a more holistic, collaborative approach to dental and medical care that focuses on prevention and wellness has the potential to drive better care, lower costs, and improve health outcomes. We're continuously evolving our thinking for fresh perspectives and ideas that reduce overtreatment, identify care gaps, and improve health outcomes.

Our research shows the value of going to the dentist and the importance of preventive care, helping us respond to the needs of a changing industry and confirming our position that oral health and overall wellness are integral. The scientific and medical communities, including the American Journal of Preventive Medicine, the Harvard School of Dental Medicine's Initiative on Integrating Oral Health and Medicine, and the University of Pennsylvania, have recognized our research, which continues today. For example, United Concordia Dental published an Oral Health Study that analyzed over 330,000 insurance records and found that medical costs and hospital visits decreased for patients receiving periodontal disease treatment. The resulting annual savings was \$5,681 per person, with hospitalization dropping as much as 39.4%.

Focus Populations

Children and Adolescents

Because children may not see a dentist as often as a medical provider, education for primary and specialty care medical providers on the importance of oral healthcare for young children is critical. For Medicaid recipients, the necessities of life (food, clothing, shelter) can take priority over children's routines and ongoing dental care. We offer training programs for medical providers (i.e., care coordinators, patient navigators, peer support specialists, community health workers, medical assistants) on oral health screening, fluoride application, referrals, and how to educate patients about the direct links between oral health and overall health.

One of Florida's Department of Health (FDoH) goals is to increase access to dental services through school-based and school-linked programs using cost-effective preventive measures, such as oral health screenings, fluoride varnish applications, and the application of dental sealants. United Concordia Dental would support the expansion and capacity of county health departments (CHDs) that have recently implemented school-based sealant programs (currently 42 of 67 counties¹) and facilitate referrals to a dental home.

In 2020, we conducted research using targeted data analytics to identify disparities in dental visits by age across Pennsylvania. We found that Hispanic toddlers had lower annual dental visits than the state average. In collaboration with our partner managed care organization, we conducted focused outreach efforts for Obstetrics and Gynecology (OBGYNs) and pediatricians then provided culturally responsive oral health education. We added additional days and locations on our mobile dental tours specific to communities where Hispanic members resided.

Pregnant Women

Florida's State Health Improvement Plan oral health objective under the maternal and child health goal to improve preconception and inter-conception health includes increasing the percentage of women 18 years old and older who have their teeth cleaned by a dentist or dental hygienist in the 12 months before pregnancy by 10% (34.5% in 2020 to 38.0%) by 2026.² To accomplish this goal, United Concordia Dental would develop collaborative efforts with school districts, OBGYN, primary care, specialty care, and dental providers to provide educational

¹ <https://pinellas.floridahealth.gov/programs-and-services/clinical-and-nutrition-services/dental/school-based-dental-sealants.html>

² *Centers for Disease Control and Prevention Pregnancy Risk Assessment Monitoring System*

messaging and training, increasing referrals based on data-driven outreach and culturally responsive approaches. Messaging media can include educational videos leveraged through social media.

Using Smart Technology

United Concordia Dental integrates dental care into all aspects of patient care by investing in technology, like electronic health records, that enables the sharing of medical and oral health information between patient clinicians. Through the collective expertise of our cross-functional teams that complement our core services, we differentiate and position our service to assist individuals in achieving their dental goals. United Concordia Dental drives integration by bridging gaps between physicians and dentists in two ways. First, we developed a user-friendly and easy process to submit electronic claims that reduce provider administrative burden and facilitate faster payment, ultimately preventing delays in care. Second, we encourage the sharing of medical and dental records and are piloting ways to provide our customers with important information about the quality of oral health and overall well-being. By developing innovative products with total health in mind and leveraging new technologies, we can help improve health outcomes for our members.

Oral Wellness and Dental Integration Consultants

Our oral wellness consultants, unique in the dental industry, are like health coaches in the medical insurance industry. They are experts in dental and offer various services designed to educate members about the importance of preventive care and the impact oral health has on the entire body. Our Oral Wellness Consultants can collaborate with providers on dental engagement and education initiatives, such as attending benefit fairs and open enrollment meetings, webinars, lunch and learn sessions, and other events.

Dental Advisory Group (DAG)

As part of our commitment to our Medicaid partners and dentist network, United Concordia Dental created a DAG in 2020, comprised of diverse stakeholders with whom we collaborate to provide quality dental care to recipients. The DAG's representation is across our Pennsylvania Medicaid network and includes multiple provider specialties such as general dentists, pediatric dentists, administrators, orthodontists, etc., along with Federally Qualified Health Center (FQHC) administrators, Public Health Dental Hygiene Program (PHDHP) hygienists, and University and Dental School educators. The DAG meets twice a year and guides United Concordia Dental in ensuring members' access to quality dental care. The DAG collaborates on the procedural and administrative aspects of supporting dental Medicaid. It is a collaborative and consultative resource for discussing trends, emerging technologies, and other factors impacting dental care for Medicaid providers, members, and insurers. Its members offer feedback on delivering dental benefits through the program. Our experience with the DAG has improved the quality of and access to care for Medicaid members.

2. Improve understanding of the unique oral health needs and identify options for integrating sedation dentistry into dental services for individuals with intellectual and developmental disabilities, including iBudget enrollees.

Oral health and dental care are essential for individuals with intellectual and developmental disabilities (IDD) and critical in ensuring equal access to care for all Floridians. To provide access to services, we leverage all available resources to get IDD patients the treatment they need through member services teams in or out-of-network. Sharing patient data for individuals with IDD is especially important for care coordination that requires medical and dental care.

For example, patients needing treatment for complex craniofacial issues, like cleft lip/palate, involve medical and dental providers. Communication and continuity of care by both providers are critical to optimizing patients' results and health, mitigating administrative barriers, and streamlining claims processing.

We also inform our understanding of the unique oral health needs of people with IDD through the meaningful involvement of our DAG. We recently facilitated an extensive discussion that led to changing our internal policy to extend service eligibility of Silver Diamine Fluoride to include individuals over 21 with special treatment needs.

Training and Education

United Concordia Dental has developed and launched a training program for treating individuals with IDD using evidence-based best practices for dentists and dental providers who work with this population through webinars, lunch and learn sessions in network practice settings, or larger gatherings at conferences and workshops.

Anesthesia and Sedation

Patients with IDD, special health needs, and young children with complex oral health conditions may require anesthesia or sedation to ensure the safe and efficient completion of the dental services they need. Anesthesia and sedation generally must be performed at ambulatory surgical centers or hospitals, limiting access for dentists due to limited hospital privileges, low Medicaid reimbursement rates, high facility fees, and availability. COVID has further limited access to operating facilities for providers. United Concordia Dental works with Medicaid primary care and safety-net providers to combine short medical procedures, such as phlebotomy and gynecology, with dental procedures that could be conducted in one sedation.

United Concordia Dental has experience partnering with providers to provide safe anesthesia in local offices and mobile settings to increase access to care affordably. Anesthesia care teams can include an anesthesiologist, a recovery nurse, and a coordinator. They carry all medications and emergency equipment, manage third-party sedation, and can consult on sedation needs. They can also cover malpractice, vetting, and provider scheduling. We would similarly explore a contract tailored to the specific dental needs of Floridians.

3. Assessing the needs of rural regions and counties, including identifying relationships that can be leveraged to serve the needs of rural populations.

Mobile Dentistry

Based on geo-access reporting analysis, we will determine dental care service needs (members without dental care for the past 12 months, dental health disparities along race/ethnicity and low dental utilization, rural member outreach, etc.) with our MCO partners. United Concordia Dental

schedules mobile dental tours for preventive dental treatment at scheduled locations throughout the Medicaid service area for children and adults. We conduct dental van tours or create a temporary building structure, usually at safety-net clinics and social service organizations. Dental providers offer exams, x-rays, cleanings, fluoride treatment, and sealant applications as necessary, with referrals to network dentists for follow-up dental needs. Our mobile dentistry team includes a state-credentialed dentist and hygienist.

Through existing local relationships throughout Florida, we work with community-based organizations and school network providers to conduct member outreach, scheduling support, visit reminders, and follow-ups as needed. United Concordia Dental would explore new locations to provide mobile services in coordination with county health departments, FQHCs, Head Start locations, and group homes for adults with disabilities. Deploying a mobile dental unit brings dental care to members and increases preventive dental visits, improving overall health.

Tele-Dentistry

United Concordia Dental has evaluated multiple teledentistry vendors for our Medicaid members. Teledentistry is an innovative approach that helps increase access to dental care via consultation, education, and public awareness. One of its primary functions is to reduce healthcare costs associated with emergency department visits. Rather than immediately heading to the emergency room for dental care, members can use the consultative aspects of teledentistry to make informed decisions about their dental care. As Medicaid members detect dental problems, they can access the teledentistry app or website and, in most instances, receive triage to assess the need to schedule a dental appointment or advise members to seek emergency dental treatment. Access to appropriate technology, whether hand-held or stationary, can help patients overcome their fear of seeing a dentist.

4. Determine the value of our current quality measures and verify other measures that might be utilized.

United Concordia Dental continues to evolve our thinking and provide fresh perspectives and ideas to help reduce overtreatment, identify care gaps, and improve health outcomes. We are working on innovative approaches using smart technology to provide insights for those with periodontal disease, a stepping-stone to full medical-dental integration. Additionally, United Concordia Dental provides robust utilization reporting that adds value to your evaluation and decision-making processes. We use utilization review and fraud detection technologies to monitor the practice pattern of each dentist. Through these systems' analytic and reporting capabilities, we ensure quality care and cost-effective use of benefit dollars.

Other Areas of Focus

Utilizing Health Analytics

United Concordia Dental is committed to addressing inequalities in dental care and oral diseases to improve oral and overall health in communities. We employ strategies such as leveraging diagnostic codes to provide extra services and supports for high-risk groups with poor oral health, such as adults with chronic conditions (diabetes, lung disease, and stroke). The Oral

Health of Florida Adults Data Brief concluded that non-Hispanic Black adults who are low-income or did not complete high school had the lowest dental visit prevalence and the highest prevalence of tooth removal than Florida's statewide prevalence in 2018.

Access

As part of our efforts, we would promote and encourage primary care providers in Florida to provide and, conversely, use our patient data for specialized care (such as chronic conditions gaps) for coordinated integrated treatment approaches, solutions, and patient education that led to improved healthcare outcomes. We would also leverage Florida's Health Access Dental License³ to expand provider capacity.

We have a partnership with CyraCom International, Inc., which provides language assistance translation services for patients whose primary language is not English that include phone and video interpretation, American Sign Language support, translation, and onsite interpretation services. All network providers in our member directory indicate the language(s) spoken, including the most common languages in Florida- English, Spanish, Haitian, and French Creole. United Concordia Dental utilizes a third-party verification system and mystery callers to gauge provider appointment availability and ensure the directory's accuracy year-round.

Health Related Social Needs (HRSN)

Best healthcare practices include integrated, person-centered, and culturally responsive services. HRSNs, or social determinants of health, deserve explicit focus. United Concordia Dental believes the same applies to oral health. We provided training for our network on how to account for the influence of HRSNs on patients' oral and overall health to inform diagnosis and treatment using a screening tool and self-awareness of personal biases. The screening tool accounts for genetic and biological factors, social and physical environment, income, education level, health behaviors, and elements that modify oral health, including age and culture.

Partnerships are essential to United Concordia Dental, as demonstrated by our ability to develop collaborative solutions and execute strategies focused on our partner's goals and patient needs. United Concordia Dental openly invites a continued discussion with AHCA on the dental managed care program and looks forward to working with AHCA on these initiatives.

³ http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=0400-0499/0466/Sections/0466.0067.html