

December 7, 2021

Ms. Andrea Casart
Centers of Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244
Andrea.Casart@cms.hhs.gov

Dear Ms. Casart:

The purpose of this letter is to formally notify the Centers for Medicare and Medicaid Services (CMS) that Iowa intends to discontinue the Healthy Behavior program for the Dental Wellness Plan (DWP) as described in the Iowa Wellness Plan Section 1115 Demonstration Waiver.

As a result, members enrolled in the DWP will no longer be required to complete two Healthy Behavior activities annually or pay a monthly dental contribution in order to receive full dental coverage. This will ensure that members get the services they need at the time they need them.

As we have discussed with our federal partners, Iowa identified a need to remove the DWP Health Behaviors for the following reasons:

- While dental providers have supported the concept around healthy behaviors, many have expressed that it is too administratively burdensome when combined with the Annual Benefit Maximum's (ABM) and has either impacted the number of DWP members they accept into their practice or have stopped participating in DWP altogether.
- Dental providers are very accustomed to operationalizing ABM's with commercial plans and more agreeable to administer this policy than the Healthy Behavior requirements. Iowa feels that (in the best interest of our members) removing the healthy behavior requirements will result in more provider participation and allow members to access needed dental care and establish dental homes.

It should be noted that the Dental Plan Administrators (DPA) will still be held responsible for ensuring access to care for members in addition to meeting performance measures related to members accessing preventive dental services. Outreach and education to members will still be an expectation and priority.

The Healthy Behaviors and member contribution requirements for the DWP program have not been implemented during the Public Health Emergency (PHE) due to the Maintenance of Effort requirements. For the current 1115 Demonstration Waiver period, the Healthy Behaviors were in place for January and February of 2020 before the PHE began.

In summary, Iowa intends to discontinue the Healthy Behavior program for the DWP as described in the Iowa Wellness Plan Section 1115 Demonstration Waiver, effective with this 1115 renewal period (January 1, 2020). The program will not be reinstated at the end of the PHE. However, Healthy Behaviors for the Iowa Wellness Plan will continue as described in the waiver for the medical services.

We appreciate the assistance of the CMS staff as Iowa works through this policy change. If you have questions, please contact Belinda Silvernail at bsilver@dhs.state.ia.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Matney". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Elizabeth Matney
Medicaid Director

EM: bs, hm