

**NOTICE OF IOWA DEPARTMENT OF HUMAN SERVICES  
PUBLIC COMMENT PERIOD TO AMEND THE 1115 IOWA WELLNESS  
DEMONSTRATION WAIVER – DENTAL WELLNESS PLAN**

Pursuant to 42 CFR 431.408, notice is hereby given that the Iowa Department of Human Services (DHS) will provide the public the opportunity to review and provide input on an amendment to the §1115 Iowa Wellness Plan Demonstration Waiver to implement program improvements to the Dental Wellness Plan (DWP) effective July 1, 2017. This notice provides details about the waiver amendment submission and serves to open the 30-day public comment period, which closes on June 2, 2017.

In addition to the 30-day public comment period in which the public will be able to provide written comments to the DHS via US postal service or electronic mail, the DHS will host two public hearings in which the public may provide verbal comments. Hearings will be held at the following dates, times, and locations:

**May 8, 2017**

Council Bluffs Public Library  
400 Willow Ave.  
Council Bluffs, IA 51503  
1:00 p.m. – 2:00 p.m.

**May 9, 2017**

State Capitol, Room 116  
1007 E. Grand Ave  
Des Moines, IA 50319  
11:00 a.m. – 12:00 p.m.  
Call in number: (866)-685-1580  
Conference code: 5157251031

Prior to finalizing the proposed waiver amendment, the DHS will consider all the written and verbal public comments received. The comments will be summarized and addressed in the final draft of the waiver amendment to be submitted to the Centers for Medicare and Medicaid Services (CMS).

**AMENDMENT PROPOSAL SUMMARY**

The DHS currently provides dental benefits to adult enrollees via two different benefit packages and management strategies which vary based on an enrollees' Medicaid eligibility group. Specifically, individuals eligible as an expansion adult are enrolled in the DWP which implements a tiered earned benefit structure delivered via managed care through a dental prepaid ambulatory health plan (PAHP). All other Medicaid-enrolled adults receive State Plan benefits via a fee-for-service delivery system.

Analysis of findings from independent evaluations of the DWP and responses received from stakeholders in response to a Request for Information (RFI) process have provided insight into the program and potential opportunities for improvement. This analysis has indicated the current delivery of adult dental benefits via two separate programs has posed challenges and complexities for both enrollees and providers. In response to these findings, the DHS seeks to implement a unified adult dental program through the proposed waiver amendment.

The State will implement an integrated dental program for all Medicaid enrollees aged 19 and over. The redesigned DWP incorporates an innovative incentive structure to improve oral health by encouraging utilization of preventive dental services and compliance with treatment plans. Movement of all adult enrollees to the DWP will result in a seamless experience for enrollees and dental providers as individuals transition through different eligibility categories.

Under the new DWP, incentives will be created for enrollees to appropriately utilize preventive dental services and maintain oral health through the elimination of premium requirements for enrollees who

complete preventive dental service requirements. An earned benefit structure will be maintained; however, the current tiered benefit structure will be eliminated to address the concern that few enrollees have been eligible for the current tier two and tier three DWP benefits due to changes in Medicaid eligibility, also referred to as churn.

Under the modified earned benefit structure, to maintain comprehensive dental benefits after their first year of enrollment without a premium obligation, enrollees must complete a State designated “healthy behavior,” including an oral health self-assessment and preventive dental exam. This structure is intended to create incentives for members to establish a dental home and encourage the receipt of preventive dental services to promote oral health and preventable oral disease conditions. Enrollees over 50% of the federal poverty level (FPL) who fail to complete these healthy behaviors within their first year of enrollment are required to contribute financially toward their dental health care costs through monthly premium contributions. Failure to make monthly premium payments will result in the enrollee being eligible for emergency dental services only for the remainder of the benefit year.

## **GOALS AND OBJECTIVES**

The DWP seeks to meet the following key goals through the redesigned DWP:

1. Ensure access to high quality dental services for all enrollees.
2. Ensure the seamless delivery of dental benefits for enrollees
3. Allow for the seamless delivery of services by providers.
4. Improve the oral health of enrollees by encouraging engagement in preventive services and compliance with treatment plans.
5. Encourage enrollee linkage to a dental home.
6. Ensure fiscal sustainability.

## **ELIGIBILITY**

Through this proposed waiver amendment, all Medicaid enrollees aged 19 and over, with the exception of the following, will be enrolled in the DWP:

- Persons enrolled in the Program of All-Inclusive Care for the Elderly (PACE)
- Persons enrolled in the Health Insurance Premium Payment Program (HIPP)
- Presumptively eligible individuals
- Nonqualified immigrants receiving time-limited coverage of certain emergency medical conditions
- Persons eligible only for the Medicare Savings Program
- Medically needy
- Periods of retroactive eligibility

Inclusion of the majority of enrollees aged 19 and over will help ensure a seamless transition for enrollees and providers as individuals’ transition through different Medicaid eligibility categories.

## ENROLLMENT & FISCAL PROJECTIONS

<b>State of Iowa</b>				
<b>Department of Human Services</b>				
<b>SFY 2018 Dental Program Estimated Fiscal Impact</b>				
<u>Population</u>	<u>Estimated Expenditures (millions)</u>			<u>Member</u>
	<u>Total</u>	<u>Federal</u>	<u>State</u>	<u>Months</u>
Wellness Plan	\$ 28.4	\$ 26.0	\$ 2.4	1,700,000
Adult FFS	31.5	18.2	13.3	1,800,000
Total	59.9	44.2	15.7	3,500,000

The State is still finalizing the necessary budget neutrality documentation for this amendment and will submit the final information to CMS when submitting the revised waiver that incorporates public comment. However, the above table illustrates the estimated SFY 2018 fiscal impact of the dental managed care program, stratified by federal and state expenditures. The estimate assumes a 58.05% FMAP for the currently adult fee-for-service (FFS) population and a 91.95% FMAP for the Wellness Plan population, as well as a 50% FMAP for state administrative expenditures. The Wellness Plan population currently has dental coverage through the DWP, and the adult fee-for-service population currently has coverage through the fee-for-service program. The illustrated costs reflect a continuation of the dental benefit for these populations under a managed care environment. Estimated costs include provision for dental service costs, managed care organization (MCO) administrative loads, and state administrative costs. Illustrated member months reflect calendar year 2016 membership; an increase in enrollment due to the modified DWP design is not anticipated. Again, the estimated costs illustrated are preliminary and will change as program details are finalized.

## BENEFITS

Enrollees will have access to the following dental benefits during their first year of DWP enrollment:

- Diagnostic/preventive dental service
  - Exams and education
  - Cleanings
  - X-rays
  - Fluoride
- Emergency & stabilization services
- Restorative services
- Non-surgical periodontal
- Endodontic care
- Crowns
- Tooth replacements
- Periodontal surgery

Additionally, enrollees under 21 years of age will continue to be eligible for medically necessary dental services in accordance with federal early and periodic screening, diagnostic, and treatment (EPSDT) requirements.

To maintain access to these full benefits in their second year of enrollment without a premium obligation, enrollees must complete the required healthy behaviors during their first enrollment year. These healthy behaviors include completion of an oral health self-assessment and preventive dental exam. Enrollees who do not complete the required healthy behaviors in this first year will have a premium obligation. Enrollees with a premium obligation who fail to make ongoing monthly premium payments will be eligible for emergency dental benefits only.

## **COST SHARING**

Enrollees over 50% FPL who have not completed a DWP healthy behavior in their first year of program enrollment will be charged a monthly dental premium, not to exceed \$3.00, beginning in their second year of enrollment. Annual completion of the required healthy behaviors will waive an enrollee's premium for the following year. Therefore, members who continue to complete the required healthy behaviors will never be subject to a monthly premium. Enrollees with a premium obligation who fail to make monthly DWP premium payments will receive emergency dental services only for the remainder of the benefit year. The \$3 copayment for dental services currently charged to adult Medicaid enrollees in the fee-for-service program will be eliminated.

The following DWP enrollees will not be charged premiums and therefore would not have their benefits reduced to emergency services only in their second year of enrollment for failure to complete healthy behaviors. Additionally, 19 & 20 year olds will continue to have EPSDT coverage regardless of completion of healthy behaviors or premium payment.

- Pregnant women
- Individuals whose medical assistance for services furnished in an institution is reduced by amounts reflecting available income other than required for personal needs
- 1915(c) home and community based waiver enrollees
- Individuals receiving hospice care
- Indians who are eligible to receive or have received an item or service furnished by an Indian health care provider or through referral under contract health services
- Breast and cervical cancer treatment program enrollees
- Medically frail enrollees (also referred to as medically exempt).

Additionally, enrollees who self-attest to a financial hardship will not have a premium obligation.

## **DELIVERY SYSTEM**

DWP benefits will continue to be delivered through the State's two dental PAHPs. All Medicaid enrollees age 19 and over will be transitioned from the current dental fee-for-service delivery system and will begin receiving benefits through a PAHP.

## **HYPOTHESES & EVALUATION**

The waiver amendment will investigate the following hypotheses related to each program goal:

**Goal 1** Ensure member access to high quality dental services

Hypothesis 1.1

DWP members will have greater access to dental care when compared to the current model.

Hypothesis 1.2

DWP members will be more likely to receive preventive dental care than under the traditional fee-for-service model.

Hypothesis 1.3

DWP members will be less likely to use emergency department services for non-traumatic dental care.

**Goal 2** Ensure the seamless delivery of benefits for DWP enrollees

Hypothesis 2.1

The earned benefit structure will not be perceived by members as a barrier to care in comparison to the current DWP.

Hypothesis 2.2

DWP members will report equal or greater satisfaction with the care provided in comparison to the current DWP.

Hypothesis 2.3

DWP members will report better understanding of their benefits when compared to the current DWP tiered structure.

**Goal 3** Allow for the seamless delivery of services by providers

Hypothesis 3.1

The earned benefit structure will not be perceived by DWP providers as a barrier to providing care when compared to the current DWP structure.

Hypothesis 3.2

DWP members will have the same access to an adequate provider network.

**Goal 4** Improve the oral health of DWP enrollees by encouraging engagement in preventive services and compliance with treatment plans

Hypothesis 4.1

The DWP earned benefit structure will increase regular use of preventive dental exams.

Hypothesis 4.2

DWP policies will promote member compliance with healthy behavior activities.

Hypothesis 4.3

In year 2 of the revised DWP and beyond, use of preventive care will be higher than in the first year of the program.

**Goal 5** Encourage enrollee linkage to a dental home

Hypothesis 5.1

DWP enrollees will be equally or more likely to use preventive dental exams through a dental home provider.

Hypothesis 5.2

DWP enrollees will be less likely to receive non-traumatic dental care through an emergency department.

Hypothesis 5.3

DWP enrollees will be more likely to comply with follow-up dental appointments.

**Goal 6** Ensure fiscal sustainability

Hypothesis 6.1

The DWP will remain budget-neutral for both the federal and State governments.

**WAIVER AUTHORITY**

The State will request continuation of all currently approved waivers and proposes the following revisions and additions to the existing Iowa Wellness Plan Title XIX waivers:

1. **Premiums:** Section 1902(a)(14) and Section 1916

To the extent necessary to enable the State to charge premiums for all Dental Wellness Plan enrollees above 50 percent of the federal poverty level who fail to complete State designated healthy behaviors, with cost-sharing subject to a quarterly aggregate cap of 5 percent of family income.

2. **Comparability:** Section 1902(a)(10)(B)

To the extent necessary to enable the State to provide emergency services only to Dental Wellness Plan enrollees subject to a premium obligation who fail to make monthly premium contribution.

**REVIEW OF DOCUMENTS & SUBMISSION OF COMMENTS**

All information regarding the DWP amendment, including this public notice, the waiver amendment, and other documentation regarding the proposal are available at

<https://dhs.iowa.gov/ime/about/initiatives/MedicaidModernization/federal-documents>. To reach all stakeholders, non-electronic copies will be made available for review at a DHS Field Office. A complete listing of DHS Field Offices is provided as an attachment to this notice.

Written comments may be addressed to Sabrina Johnson, Department of Human Services, Iowa Medicaid Enterprise, 100 Army Post Road, Des Moines, IA 50315. Comments may also be sent via electronic mail to [imedentalwellnessplan@dhs.state.ia.us](mailto:imedentalwellnessplan@dhs.state.ia.us). All comments must be received by June 2, 2017 at 5:00 p.m.

Submitted by:

Mikki Stier, Medicaid Director

Iowa Medicaid Enterprise

Iowa Department of Human Services

**Attachment: DHS Field Office Locations**

<b>County</b>	<b>Building Name</b>	<b>Building Address</b>	<b>City</b>	<b>Zip</b>
Benton	Benton County DHS	114 E 4th Street	Vinton	52349
Black Hawk	Black Hawk County DHS	1407 Independence Ave.	Waterloo	50704
Buchanan	Buchanan County DHS	1415 1st Street West	Independence	50644
Buena Vista	Buena Vista County DHS	311 E. 5th Street	Storm Lake	50588
Butler	Butler County DHS	713 Elm Street	Allison	50602
Carroll	Carroll County DHS	608 N Court Street, Ste. C	Carroll	51401
Cass	Cass County DHS	601 Walnut Street	Atlantic	50022
Cerro Gordo	Cerro Gordo County DHS	Mohawk Square, 22 N Georgia Ave, Ste. 1	Mason City	50401
Clarke	Clarke County DHS	109 S Main	Osceola	50213
Clay	Clay County DHS	1900 North Grand Ave. Ste. E-8	Spencer	51301
Clinton	Clinton County DHS	121 Sixth Ave S.	Clinton	52733
Dallas	Dallas County DHS	210 N 10th Street	Adel	50003
Des Moines	Des Moines County DHS	560 Division Street, Suite 200	Burlington	52601
Dickinson	Dickinson County DHS	Dickinson County Courthouse 1802 Hill Ave, Suite 2401	Spirit Lake	51360
Dubuque	Dubuque County DHS	410 Nesler Center, 799 Main Street	Dubuque	52004
Emmet	Emmet County DHS	220 S 1st Street	Estherville	51334
Fayette	Fayette County DHS	129 A North Vine	West Union	52175

<b>County</b>	<b>Building Name</b>	<b>Building Address</b>	<b>City</b>	<b>Zip</b>
Floyd	Floyd County DHS	1206 S Main Street	Charles City	50616
Hamilton	Hamilton County DHS	2300 Superior Street	Webster City	50595
Harrison	Harrison County DHS	204 E 6th St	Logan	51546
Henry	Henry County DHS	205 W Madison Street	Mt. Pleasant	52641
Jasper	Jasper County DHS	115 N 2nd Ave E. Suite H	Newton	50208
Jefferson	Jefferson County DHS	304 South Maple	Fairfield	52556
Johnson	Johnson County DHS	855 S. Dubuque Street	Iowa City	52240
Lee	Lee County DHS	933 Avenue H	Ft. Madison	52627
Lee	Lee County DHS	307 Bank Street	Keokuk	52632
Linn	Linn County DHS	411 3rd Street SE, Suite 600	Cedar Rapids	52401
Linn	Linn County DHS, Harambee House	404 17th Street Southeast	Cedar Rapids	52403
Mahaska	Mahaska County DHS	410 S 11th Street	Oskaloosa	52577
Marshall	Marshall County DHS	206 W State Street	Marshalltown	50158
Montgomery	Montgomery County DHS	1109 Highland Ave	Red Oak	51566
Muscatine	Muscatine County DHS	3210 Harmony Lane	Muscatine	52653
O'Brien	O'Brien County DHS	160 Second Street Se	Primghar	51245
Polk	Polk County DHS	Polk County River Place, 2309 Euclid Ave	Des Moines	50310
Polk	Polk County DHS- Carpenter Office	1900-1914 Carpenter	Des Moines	50314

<b>County</b>	<b>Building Name</b>	<b>Building Address</b>	<b>City</b>	<b>Zip</b>
Polk	Centralized Service Intake Unit	401 SW 7th St, Suite G	Des Moines	50309
Pottawattamie	Pottawattamie County DHS	417 E Kaneshville Blvd.	Council Bluffs	51503
Pottawattamie	Income Maintenance Customer Call Center	300 W Broadway, Suite 110	Council Bluffs	51503
Scott	Scott County DHS	600 W. 4th St. 2nd & 3rd Floors	Davenport	52801
Sioux	Sioux County DHS	215 Central Ave. Se	Orange City	50141
Story	Story County DHS	126 S Kellogg Ave, Suite 101	Ames	50010
Union	Union County DHS (SVC)	304 N Pine St	Creston	50801
Union	Union County DHS	300 N Pine St	Creston	50801
Wapello	Wapello County DHS	120 E Main St	Ottumwa	52501
Warren	Warren County DHS	1005 South Jefferson Way	Indianola	50125
Webster	Webster County DHS	330 1st Ave. N	Fort Dodge	50501
Winneshiek	Winneshiek County DHS	2307 US Highway 52 South	Decorah	52101
Woodbury	Woodbury County DHS	Trosper-Hoyt Co Svc Bld., 822 Douglas St	Sioux City	51101