

September 10, 2015

Mr. Pedro Nava  
Chairman, Little Hoover Commission  
925 L Street, Suite 805  
Sacramento, CA 95814

Dear Mr. Nava:

Children Now has been in the vanguard of California health advocates calling for reform of the Medi-Cal Dental Program, better known as Denti-Cal. Children Now has collaborated with other stakeholders and the Medi-Cal Dental Program itself to:

- Assist public health sites providing free care to begin to bill Denti-Cal;
- Establish a medical-dental collaboration pilot in Los Angeles County to help primary care providers make better informed, more strategic dental referrals to young Medi-Cal beneficiaries (project overview attached); and
- Work within the Los Angeles Prepaid Health Plan Stakeholder process to ensure that Medi-Cal Dental Managed Care in Los Angeles County is held accountable.

Our work with the First Five Association to identify barriers to public health sites' ability and interest to bill Denti-Cal is especially relevant to the Commission's investigation. For example, First 5 San Mateo concluded that billing Denti-Cal cost more in administrative time than the actual reimbursement rate would cover, making "charity care" paid by First 5 the de facto option.

California should explore how to emulate and further expand successful state Medicaid dental programs with a track record of bringing more care to children. In Washington, for example, the Access to Baby and Child Dentistry (ABCD) program provides care to Medicaid-enrolled children ages zero to six through a community-based program that gives enhanced reimbursement rates and training to dentists. A similar program called Healthy Kids, Healthy Teeth exists in Alameda County and provides enhanced reimbursement rates using county dollars. Such targeted investments could help produce better outcomes for beneficiaries.

Additionally, with implementation of State Plan Amendment 15-005 allowing the enrollment of Registered Dental Hygienists (RDHs), and Registered Dental Hygienists in Extended Functions (RDHEFs) into the Medi-Cal Dental Program as providers,<sup>1</sup> we hope that the Little Hoover Commission study will contain recommendations on how to improve the program so that these new positions will also be attracted to serve and thus help to increase the number of available providers who can serve eligible children.

As shared above, Children Now has several ideas to help improve the Denti-Cal program, and is involved in several initiatives and stakeholder processes working to address the problems that the Little Hoover Commission might also uncover. For example, we are on both the California Oral Health Advisory Committee convened by the California Department of Public Health and the recently formed Medi-Cal Dental Services Division (MDSD) Workgroup. Children Now is also part of the state leadership team helping MDSD implement the Statewide Pediatric Oral Health Action Plan as called for by the Centers for Medicare and Medicaid Services to achieve two goals related to pediatric oral health, specifically preventive services and application of dental sealants.

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<sup>1</sup> If the RDH or RDHEF is employed by: (1) a public health program created by Federal, State, or local law; or (2) a public health program managed by a Federal, State, county, or local governmental entity.

We look forward to attending the public hearing on Thursday, September 24 to share our thoughts and to working with you and the Commission to assist this work. If you have any questions, please feel free to contact me at 510-763-2444, x114 or via email, [eespejo@childrennow.org](mailto:eespejo@childrennow.org).

Kind Regards,

A handwritten signature in cursive script, appearing to read "Eileen Espejo".

Eileen Espejo  
Senior Managing Director, Media & Health Policy