



Response to AHCA RFI # 014-22/23

Procurement of the Statewide Medicaid Prepaid Dental Program

Prepared by Managed Care of North America, Inc.
for the State of Florida Agency for Health Care Administration
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Corporate Introduction

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Managed Care of North America, Inc. (MCNA) is a Fort Lauderdale, Florida-based company with deep roots in the communities we serve. We have been licensed as a Florida Prepaid Limited Health Services organization since 1992 (Florida Company Code 66015). Since our founding, MCNA’s mission has been delivering value to our state clients and participating dentists by providing access to quality dental care and service excellence that improves the oral health outcomes of our members.

MCNA’s mission has been fully aligned with AHCA’s goals to improve the quality of care and outcomes for the State’s most vulnerable residents. We are focused primarily on Medicaid and CHIP programs, making MCNA the premier dental benefits administrator and partner to the states and managed care organizations we serve. We currently serve over 5,200,000 children and adults throughout the nation.

MCNA appreciates the opportunity to provide input into the dental program design. We support the AHCA’s areas of focus with respect to the Florida Medicaid population and support all population health and integrated care priorities.

Recommendations for RFI Focus Areas

MCNA is pleased to present the following recommendations to enhance AHCA’s business model and strengthen dental service delivery for enrollees in the Statewide Medicaid Prepaid Dental Program.

- **Dental Plan Accreditation**

MCNA is committed to quality. In 2014, we became the first dental plan in the nation to receive full Dental Plan Accreditation from URAC, and successfully achieved reaccreditation in 2017 and 2020. We have also been accredited by the National Committee for Quality Assurance (NCQA) for Credentialing and Recredentialing since 2011. We recommend requiring full URAC Dental Plan Accreditation specific to Florida,

for all dental plans, whether directly contracted or subcontracted, to serve the Florida Medicaid membership.

- **Provider Education/Certification to Support Individuals with Intellectual and Developmental Disabilities (IDD)**

MCNA is excited about the opportunity to educate our providers about ways to enhance service to members with an IDD diagnosis. We appreciate the Florida Department of Health Public Health Dental Program's proposed use of HRSA grant funding to bring the University of Pennsylvania's IDD training to Florida dentists, hygienists, and dental assistants. We support their approach to expand and educate the dental community on successful approaches to care when treating patients with an IDD diagnosis. We look forward to being a collaborative partner to AHCA to bring other similar opportunities to our network of providers.

Reimbursement for ambulatory surgical centers and hospitals needs to be increased for dental procedures. The rates should be equivalent for dental and medical as the facility and anesthesia services are not very different based on the type of care being provided. This could help create additional access to care for those with disabilities or complex clinical conditions that require care in this type of setting.

- **Population Support for Children, Adolescents, Pregnant Women, the Elderly, and Individuals with Intellectual and Developmental Disabilities**

Improved health outcomes and access to quality care are the pillars to our approach to population health management. MCNA's goal is to help support our members by removing barriers to care and making it easy to access services. Our proven approach in Florida and other markets reduces avoidable health care utilization in high-cost settings.

In full recognition of the nexus between physical and oral health, MCNA supports care management that partners patient navigators with members and their families. We understand that our members in these vulnerable populations need an advocate to coordinate and integrate their dental care with primary care services. We recommend including provisions in the upcoming ITN that require a robust oral health literacy program designed to focus on preventive care and reducing anxiety related to dental visits, which has been shown to be a deterrent to care for individuals with intellectual and developmental disabilities. Coverage for periodontal services and periodontal maintenance with an adequate reimbursement rate is specifically recommended for pregnant women.

Additionally, we recommend that the agency establish the transfer of key utilization data related to opioid use, diabetes, heart disease, and other key disease states and medications that have an oral health impact. Specifically, the medical plans must be required to provide pharmacy data in a format and frequency that would enable timely population health and care management interventions.

- **Enhanced Provider Access and Satisfaction**

MCNA is committed to the continuous enhancement of our provider network, and our years of statewide network development in Florida have provided us with a unique perspective. We understand that the distinctive geographic differences between rural and urban areas within Florida require the application of a separate set of strategies and standards. Provider satisfaction is of paramount importance to MCNA, and our reimbursement methodology is designed to facilitate the continued growth of our care network. Traditionally, the dental community has not supported value-based payment (VBP) strategies that place providers at-risk, and dental care cannot be bundled because the services are billed using CDT codes that are specific to the procedures rendered. With these two factors in mind, MCNA recommends the use of a VBP design consistent with a pay-for-quality approach as opposed to complicated risk models and capitation.

Florida has multiple health professional shortage areas, and we believe those areas should be handled in a manner that acknowledges the lack of available providers and offers a reasonable approach to network adequacy. Current geoaccess standards rely on member to provider ratios which are not evidence-based and are not used in other states with similar populations. For example, this ratio approach assumes that all children need to access services from an endodontist when that is actually a limited specialty for young children as their primary teeth do not have root structure. An additional factor to consider when examining access is that though all dental contractors operate on a statewide basis, current geoaccess standards are regionally based. MCNA recommends that all geoaccess standards be ran on a statewide basis, and the provider ratios utilized by AHCA be updated to reflect only evidence-based criteria and take into account standards used in other markets with similar populations.

- **Increased Member Satisfaction and Care Engagement**

MCNA has enjoyed very high levels of member satisfaction and we attribute this to the training our team completes before they interact with our members. Cultural competency training is considered a core skill set and required for all MCNA employees and contractors. Additionally, our translation services and interpretation resources are readily available for anyone with limited English proficiency (LEP).

We recommend changing the requirements for the Healthy Behaviors incentive programs to provide a reward for a single action rather than requiring members to complete a series of actions before a reward can be given. We believe this will go further in accomplishing the behavior changes desired because immediate rewards are associated with enhanced intrinsic motivation.¹

¹ Liu, Yuxia et al. "Do Immediate External Rewards Really Enhance Intrinsic Motivation?" *Frontiers in Psychology* vol. 13 853879. 16 May. 2022, doi:10.3389/fpsyg.2022.853879

Proud Partner to AHCA

Throughout our more than 30 years of experience in Florida and nationwide, MCNA has remained dedicated to providing care to Florida's most vulnerable residents. Since our founding in 1992, we have grown from a small family-owned organization to a national leader in dental managed care. We have built upon our years of experience serving AHCA, the Florida Healthy Kids Corporation, numerous Florida Medicaid managed care plans, and Medicaid and CHIP programs around the country to provide best-in-class care to diverse populations. MCNA is excited about the opportunity to share ideas with AHCA as we continue supporting the dental needs of Florida's children, adolescents, and adults.