

**Cecile Erwin Young** *Executive Commissioner* 

October 24, 2024

Dear

Thank you for your inquiry dated October 16, 2024, regarding the reimbursement rate review of Dental Services under Medicaid. All feedback the Texas Health and Human Services Commission (HHSC) receives is taken into careful consideration.

HHSC is aware of the sensitive nature of these services and the importance they have for many Texans. As such, HHSC takes great care when reviewing these reimbursement rates and invests a considerable amount of time to ensure our rates are consistent with efficiency, economy, and quality of care. The agency also considers access-to-care when setting rates, maintaining reimbursement that is sufficient to attract enough providers so services are available to beneficiaries to the extent that those services are available to the general population. HHSC must do so while adhering to the Texas Administrative Code and our State Plan, both of which guide HHSC's application of appropriate reimbursement rate methodologies.

The Dental Services topic is part of the HHSC Provider Finance Department's (PFD) calendar fee review process and is reviewed at least once every two years. However, this topic has been subject to substantial public commentary every time rate changes have been proposed, causing delays in rate updates. Dental code D0145 has been one of the key focuses of commentary. The current D0145 benefit is a bundled service. This bundle incorporates commonly provided services described within the Dental Services portion of the Texas Medicaid Provider

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Procedures Manual and the current rate was meant to cover all services administered within this bundle.

For the November 12, 2024 rate hearing, Dental Services are divided into two topics: Calendar Fee Review and Medical Policy Review. The rate change to D0145 is being proposed in conjunction with policy changes to unbundle services previously included in the D0145 rate. However, the proposed rates for each of the component services equal the current rate for D0145 when added together. Therefore, if a provider renders and bills for all services previously included in the D0145 bundle, they will still receive reimbursement commensurate with the current bundled D0145 rate.

HHSC-PFD posted rate packets for proposed rates to be presented at the November 12, 2024 rate hearing on October 16, 2024. An error was identified in the rate packet for Dental Services. Most of the procedure codes indicated a 2 percent difference from the current rate to the proposed rate. In actuality, the rate changes were highly varied because the calendar fee review included a comprehensive review of rates to align with methodology. An updated rate packet was posted on the agency website on October 17, 2024, and a GovDelivery was subsequently sent on October 18, 2024.

HHSC invites public commentary on proposed rates before their adoption. We encourage interested parties to provide testimony, voice their concerns, and share information so we can incorporate that feedback into rate adoption decisions. We are accepting commentary for all proposed rate actions to be presented at the rate hearing now through 5:00 p.m. (Central Standard Time) on November 12, 2024. Written comments may be sent by U.S. mail to:

The Texas Health and Human Services Commission Attention: Provider Finance Department Mail Code H-400 P.O. Box 149030 Austin, Texas 78714-9030

Interested parties may also provide commentary via fax to the Provider Finance Department at (512) 730-7475; or by email to PFDAcuteCare@hhs.texas.gov.

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Please let us know if you have any questions or need additional information. Megan Wolfe, Deputy Director of Provider Finance, serves as the lead staff on this matter, and she can be reached by telephone at (512) 517-0435 or by email at Megan.Wolfe@hhs.texas.gov.

Sincerely,

Trey Wood

Chief Financial Officer