This issue began in spring of 2015 with the Department of Health Care Services (DHCS) proposing that:

- Elderly and special needs patients of independent hygienists, Registered Dental Hygienists in Alternative Practice (RDHAPs) must obtain prior authorization from DHCS for periodontal disease treatment because that is what is required of patients in traditional dental offices
- The dentist the RDHAP works with for purposes of the RDHAP license must be a Denti-Cal dentist
- The RDHAP must bill only for specific codes
- Full mouth x-rays must be included with the new pre-authorization request, even though neither were required for these special patients before

Instead, the new policy implemented in July 2016 by the DHCS includes:

- Required prior authorization for periodontal treatment using photos or x-rays – if the RDHAP has access to x-ray equipment and the patient can tolerate the x-rays
- X-rays reimbursed up to $40
- Photos reimbursed at $6/photo (up to four photos per date of service)
- Reduced rate for Periodontal Maintenance from $130 to $55
- Periodontal maintenance reimbursed once a quarter for patients in SNF/ICF or homebound
- One debridement a year reimbursed at $75
- Fluoride (three a year) for SNF/ICF residents reimbursed at $6
- Prophylaxis (three a year) reimbursed (D1110) $40 or (D1120) $30

WHY THE NEW POLICY DOESN’T WORK

Though the policy does not include all of the requirements DHCS first proposed in 2015, it is by no means helpful to patients or RDHAPs. Patients who are homebound, in skilled nursing facilities or in intermediate care facilities cannot tolerate treatment the way it is provided in a dental office due to their physical or cognitive disabilities.

- RDHAPs are trained specifically to provide care to these patients in a manner that the patients can tolerate in the field, often at their bedside
- Treatment for these patients was never intended to be provided in the same manner as in the dental office
- Two OSHPD studies revealed that these trained and educated RDHAPs provide dental hygiene treatment, while in a different manner, just as safely and effectively as it is provided in a dental office
The prior authorization requirement in the new policy will harm patients by delaying care, requiring multiple visits, and often denying needed treatment.

Cutting the periodontal maintenance reimbursement to less than half of what it was means it will now cost the RDHAP to provide that treatment. Patients who truly need the care the most will lose their healthcare because their providers can no longer afford to treat them. Denti-Cal already has a shortage of registered providers and will have even fewer without the RDHAP.

After the initial scaling and root planing hygiene treatment, a periodontal maintenance treatment every three months is the standard of care for patients who have periodontal disease. The other treatments offered, while a nice gesture, cannot be substituted for periodontal maintenance.

Solution

Immediately revise the new policy as follows:

• Instead of prior authorization, simply require the Periodontal Exam Record and intra oral photos be submitted with the claim.

• Restore the reimbursement for periodontal maintenance to $130 and allow treatment once per quarter for all Denti-Cal patients (includes homebound).