

Section 1115 Demonstration Waiver Application

Expansion of Dental Services for Adults with Diabetes

**State of Nevada
Department of Health and Human Services**



**Nevada Department of
Health and Human Services**
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July 2022 – Draft for Public Comment

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1115 Demonstration Summary

A. Program Summary

The Nevada Department of Health and Human Services (DHHS) is requesting authority from the Centers for Medicare & Medicaid Services (CMS) for a five-year, section 1115 demonstration waiver to expand access to dental services for adults with diabetes in Nevada who receive services from participating federally qualified health centers (FQHCs). Specifically, DHHS seeks authority to waive federal requirements in Medicaid for “statewideness” and “comparability” under the Social Security Act to provide this new benefit to a subset of adults enrolled in Medicaid in Nevada. This Demonstration will further the objectives of Title XIX and Title XXI of the Social Security Act by improving access to high-quality, dental services that produce positive health outcomes for individuals with diabetes. The Demonstration will not modify the Nevada’s current Medicaid program or Children’s Health Insurance Program (CHIP) outside of the dental benefits described within the application.

B. Demonstration Goals & Objectives

The State’s goals for this Demonstration are to improve access to dental services for adults with diabetes by expanding access to a subset of dental providers, specifically federally qualified health centers who are eligible to participate in the Demonstration. By improving access to dental services, the State expects that health outcomes will improve among this population.

C. Eligible Populations

Eligibility Group Name	Social Security Act and CFR Citations	Income Level
Adults without children	Section 1902(a)(10)(A)(i)(VIII) 42 CFR 435.119	At or below 138% of FPL
Parents and caretakers	Section 902(a)(10)(A)(i)(I) and 1931 42 CFR 435.110	At or below 138% of FPL

To be eligible for the waiver demonstration, Nevada Medicaid enrollees who qualify as one of the two eligibility groups above (i.e., Medicaid-enrolled parents and/or adults without children) must also meet the following criteria:

1. Have a medical diagnosis of type 1 or type 2 diabetes; and
2. Be a patient of record at the participating FQHC providing the dental services.

No limits will be applied to enrollment or changes to Medicaid enrollment for members eligible for the waiver benefit.

D. Proposed Hypothesis

Nevada is proposing to test the effects of improving access to dental benefits in Medicaid on health outcomes for a subset of the state’s eligible nonpregnant, adult and parent population, specifically those with a diagnosis of type 1 or 2 diabetes. Through this waiver demonstration, the state expects to improve access to dental services and overall health outcomes of this population.

The information below is an overview of a preliminary plan to evaluate the demonstration. This evaluation plan is subject to change and will be further defined as the program is implemented. The measures identified in the table below will be tracked and compared across demonstration years to test each hypothesis.

Goal: Improve access to dental services for eligible adults and parents/caretakers with diabetes who are enrolled in Medicaid and served by participating FQHCs.

Hypothesis	Example Measure	Data Source
The demonstration will result in increased access to preventive dental services for participating enrollees.	The percentage of participating enrollees who receive an annual preventive dental service exam as compared to the percentage of participating enrollees who receive an annual preventive dental service exam in waiver year 1. Waiver Year 1 will serve as a baseline year for this measure for evaluating improvements in access over time.	MMIS (claims)

Goal: Improve health outcomes for participating enrollees (i.e., adult enrollees with diabetes).

Hypothesis	Example Measure	Data Source
The demonstration will result in fewer hospital admissions for the demonstration population due to nonmanagement of oral health needs.	Over the course of the waiver, the percentage of hospital admissions for non-traumatic dental conditions or dental-related emergency procedures among this population will not increase as compared to enrollees in Waiver Year 1.	MMIS data Statewide hospital admissions data
The demonstration will control or reduce the incidence of periodontal disease among the demonstration population.	Over the course of the waiver, the percentage of enrollees with periodontal health as indicated by radiographic bone loss and probing depths will increase as compared to waiver year 1 baseline levels. Waiver Year 1 will serve as a baseline year for this measure for evaluating improvements in outcomes over time.	MMIS data FQHC patient records
The demonstration will result in fewer emergency room visits related to nonmanagement of diabetic conditions for this	Over the course of the waiver, the percentage of emergency room visits for diabetic emergencies will not increase as compared to Waiver Year 1.	MMIS data Statewide hospital admissions data

population.	Waiver Year 1 will serve as a baseline year for this measure for evaluating improvements in outcomes over time.	
The demonstration will result in lower levels of and management of A1c levels for this population.	Over the course of the waiver, the A1c levels of enrollees will not increase as compared to their A1c levels as captured in Waiver Year 1. Waiver Year 1 will serve as a baseline year for this measure for evaluating improvements in outcomes over time.	FQHC laboratory data
The demonstration will result improvements in quality of life for this population.	Over the course of the waiver, the quality of life will improve from the baseline scores captured in Waiver Year 1. Waiver Year 1 will serve as a baseline year for this measure for evaluating improvements in outcomes over time.	Baseline and annual survey received from FQHC dental providers

E. Benefits & Cost Sharing

This demonstration project will provide a new dental benefit to the demonstration-eligible population through participating FQHC providers. Currently, this population is only eligible for limited emergency dental services. The new dental benefit will include diagnostic, preventives, and restorative services as further described below.

The state is proposing a benefit schedule for dental care for the demonstration-eligible population that resembles the expanded Medicaid dental benefit set available to pregnant women. For more information on this expanded benefit set, please see MSM Chapter 1000 available [here](#) and the specific billing codes for this benefit available [here](#). There will be no change to the state’s Essential Health Benefit set for the Nevada Medicaid population. Table 2 below identifies the benefit package per eligibility group that is affected by the demonstration. It should be noted that a small subset of each of these eligibility groups will be eligible for the demonstration-only dental benefit based on the criteria described above in the Eligibility section.

Benefit Package by Eligibility Group Affected by Demonstration

Eligibility Group	Benefit Package
Adults without Children & Parents/Caretakers (Newly Eligible under Expansion)	Alternate Benefit Plan plus Demonstration-Only Dental Benefit

Adults without Children & Parents/Caretakers	State Plan Benefits plus Demonstration-Only Dental Benefit
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The state is not proposing any changes to cost-sharing under this demonstration. The demonstration will also not have any beneficiary requirements for premiums. Table 3 below describes the specifications and limitations of the new dental benefit set for participants.

Benefit	Amount, Duration, & Scope	Reference
The Expanded Dental Benefit Sent for Pregnant Women in Nevada Medicaid as approved in State Plan	All limitations and specifications for this expanded benefit set are outlined in Nevada Medicaid billing guidelines for covered services for Provider Type 22, here . The state will also be applying an overall annual limit on all covered services under this new benefit for dental services of no more than five covered services per recipient.	Optional SSA 1905(a)(10)

F. Demonstration Financing and Budget Neutrality

Given the unique design of this demonstration and the lack of adult dental experience in Nevada, DHCFP was unable to use historical data to estimate costs associated with providing dental coverage to diabetic adults in an FQHC. Therefore, to develop the budget neutrality figures, DHCFP determined the number of unique adults that have diabetes and had a visit at either of the two FQHCs, that were expected to participate in this demonstration during federal fiscal year 2021 across fee-for-service or managed care. Using this unique count of members, DHCFP was able to calculate the estimated member months for the demonstration and included all members within a single MEG. As the data used includes some level of increased enrollment from the public health emergency, DHCFP did not apply any trend to the enrollment throughout the demonstration and held the member months flat.

Also using this unique member count, DHCFP assumed that 90% of those members will receive the full five visits allowed under the demonstration. The high utilization expected is due to a number of factors:

- DHCFP expects there to be a high degree of pent-up demand in this population given the limited dental benefits available to adults in Medicaid currently.
- As these members are already receiving care at the FQHCs, it is expected that these FQHCs will encourage the members to use the dental benefit provided.

After the utilization was determined, DHCFP applied a unit cost, which is the weighted average of the dental PPS rates paid to the two FQHCs included in the demonstration. This weighted average was based on the number of diabetic adult members receiving care at each of the FQHCs. The president’s budget

trend rate was then applied to the computed per member per month (PMPM) to complete the budget neutrality projections. A table below shows the expected enrollment, PMPMs, and estimated aggregate expenditures for the demonstration.

	DY 1	DY 2	DY 3	DY 4	DY 5	Total
Enrollment (in member months)	16,812	16,812	16,812	16,812	16,812	
PMPM	\$106.67	\$106.67	\$106.67	\$106.67	\$106.67	
Total Expenditures	\$1,793,408.89	\$1,793,408.89	\$1,793,408.89	\$1,793,408.89	\$1,793,408.89	

G. Public Notice & Comment

The Nevada DHHS published a notice of the public comment period for the Demonstration waiver on July 18, 2022. The notice was published on the DHCFP website at <http://dhcfp.nv.gov/Public/AdminSupport/PublicNotices/>, and on the State’s public notice website at <https://notice.nv.gov/>. The latter may be accessed by using the website’s drop-down menus by selecting “State” as the Government type, “Department of Health and Human Services” as the Entity type, and “Division of Health Care Financing and Policy” as the Public Body.

The state intends to also host an additional hearing on August 30, 2022. For more information, notice and agenda for public hearings on this waiver will be posted online also at <http://dhcfp.nv.gov>, <http://dhcfp.nv.gov/Pgms/waivers/1115OHDiabetes>, and <http://notice.nv.gov>, as well as Carson City, Las Vegas, Elko, and Reno central offices for DHCFP.

The published notice includes details of the waiver application, dates, and locations for public hearings of which include teleconferencing and videoconferencing, as well as the physical and email addresses where interested parties could submit written comments to 1115waivers@dhcfp.nv.gov. **The initial comment period began on July 18, 2022 and has been extended through September 19, 2022.**

E-mail notice has been made to such individuals as have requested notice of meetings (to request notifications please contact 1115waivers@dhcfp.nv.gov, or in writing at 1100 East William Street, Suite 101, Carson City, Nevada 89701.)

If you require a physical copy of supporting material for the public meeting, please contact, or at 1100 East William Street, Suite 101, Carson City, Nevada 89701. Supporting material will also be posted online as referenced above.

Note: We are pleased to make reasonable accommodations for members of the public with a disability that wish to participate. If accommodated arrangements are necessary, notify DHCFP as soon as

possible and at least ten days in advance of the meeting, by e-mail at 1115waivers@dhefp.nv.gov or in writing, at 1100 East William Street, Suite 101, Carson City, Nevada 89701.