



**Date:** June 16, 2022

**To:** Coordinated care organizations  
Dental care organizations

**From:** Dave Inbody, CCO Operations Manager

**Subject:** New non-Medicaid dental programs and CCOs

This communication is regarding the following new non-Medicaid dental programs authorized by the 2022 Legislature:

- *Enrolled House Bill [4095](#)*: This bill established the Veterans Dental Program to provide oral health care to lower-income veterans who reside in Oregon and who are ineligible for Medicaid.
- *Enrolled Senate Bill [1538](#)*: This bill established the COFA Dental Program to provide oral health care to lower-income citizens of the island nations in the Compact of Free Association (COFA) who reside in Oregon and who are ineligible for Medicaid.

The Oregon Health Authority (OHA) expects to provide services under both new programs effective January 1, 2023.

Both bills direct OHA to contract with dental care organizations (DCOs) that serve coordinated care organization (CCO) members throughout the state and with individual oral health providers in areas not served by DCOs to provide services to eligible individuals. This direction does not take into account the following factors:

1. OHA previously decided to terminate its direct contracts with DCOs at the end of 2022 and to enroll those fee-for-service members into CCOs effective January 1, 2023, under a new plan type called "CCOF." Under this plan type, oral health services are paid for by the CCO and physical and behavioral health services are paid for by OHA's fee-for-service program. CCOs provide oral health services to their members through a combination of subcontracts with DCOs and direct contracts with oral health providers.
2. OHA's direct contracts with DCOs are for Medicaid services, yet the services covered by the two bills are paid for with State funds only. The Centers for Medicare and Medicaid Services has final approval authority over OHA's contracts with DCOs and does not permit non-Medicaid services to be included in Medicaid contracts. OHA does not have non-Medicaid managed care contracts with DCOs. However, OHA already has a non-Medicaid managed care contract with each CCO. The contract is for the Cover All Kids program, which will expand to the Healthier Oregon Program effective July 1, 2022. Acceptance of the non-Medicaid contract is a condition of each CCO's Medicaid contract award; the non-Medicaid contract is substantively similar to the Medicaid contract, save the source of funds used to pay the CCOs.

OHA has consulted with subject matter experts about the above factors and the legislative intent of the two bills. The bills indicate that services should be provided through a managed care delivery system and identify DCOs and oral health providers as the service delivery mechanisms. OHA has determined, consistent with the legislative intent of HB 4095 and SB 1538, to enroll the individuals eligible for oral health services in CCOs in the “CCOF” plan type and to have those services administered by the CCOs under their non-Medicaid managed care contracts.

OHA will communicate with CCOs about implementation of the two new dental programs over the coming months. Draft contract language and payment rates for the non-Medicaid contract will be provided to CCOs by September 16, 2022, consistent with the schedule previously provided by OHA to CCOs.

### **Questions?**

If you have general questions about this communication, please contact Cheryl Henning, CCO Contracts Administrator and Interim DCO Contracts Administrator, at [Cheryl.L.Henning@dhsoha.state.or.us](mailto:Cheryl.L.Henning@dhsoha.state.or.us).

Thank you for your continued support of the Oregon Health Plan (OHP) and the services you provide to OHP members.