

### Comparing utilization between Denti-Cal and the Dental Managed Care (DMC) Program is completely invalid.

Denti-Cal data includes utilization related to dental services submitted by other health care practitioners and DMC data does not. This prevents an “apples to apples” comparison between Denti-Cal and DMC data.



### Balancing the Equation

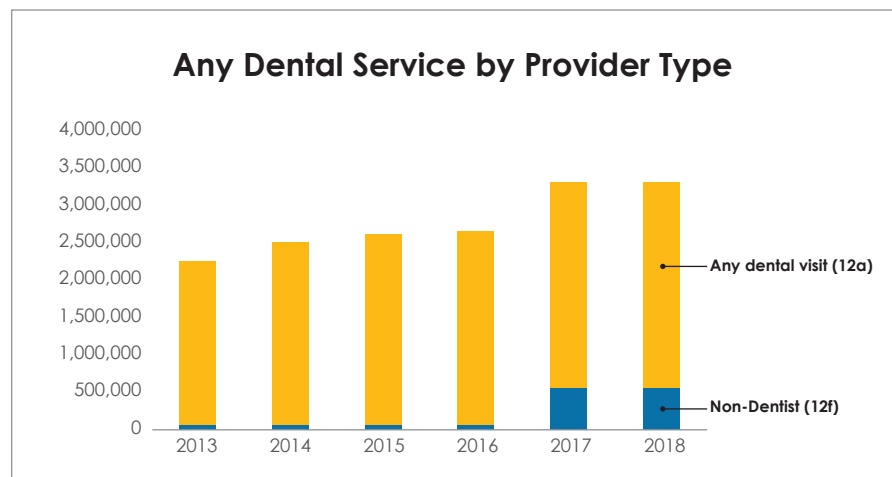
	2017	2018
FFS	37.33%	37.38%
PHP - LIBERTY	44.80%	43.79%
GMC - LIBERTY	42.40%	43.32%

When removing dental services provided by other health care practitioners from the calculation, the DMC plans have higher utilization than Denti-Cal in GMC and PHP.

California reports utilization to the federal government using the CMS-416 12a Any Dental Service measure, which calculates utilization by counting the unduplicated number of individuals under age 21 with at least 90 continuous days of enrollment who received at least one dental service. This measure captures preventive services, treatment services, sealants, and diagnostic dental services.

### Federal guidance allows states to include dental utilization in CMS-416 12a Any Dental Services provided by:

- A dentist or under the supervision of a dentist (CMS-416 12b – 12e)
- Any qualified health care practitioner (neither a dentist nor providing services under supervision of a dentist; could include hygienists working unsupervised by a dentist) (isolated as CMS-416 12f)



Since 2017, dental services provided by qualified health care practitioners (not dentists or hygienists under the supervision of a dentist) have become a significant portion of California's dental utilization (20.7% in 2018).

### California CMS-416 Utilization Data

	2013	2014	2015	2016	2017	2018
Eligibles	5,113,405	5,534,421	5,782,808	5,988,018	5,919,941	5,757,214
12a Any Dental Visit - Dental Practitioner	2,209,031	2,478,392	2,569,524	2,627,226	2,786,093	2,759,074
Any Dental Service %	43.20%	44.80%	44.40%	43.90%	47.10%	47.90%
12f Non-Dentist	56,660	55,942	69,861	62,317	560,010	571,206
Any Dental Service without 12f	2,152,371	2,422,450	2,499,663	2,564,909	2,226,083	2,187,868
Any Dental Service % without 12f	42.10%	43.80%	43.20%	42.80%	37.60%	38.00%

Source: CMS.

See attached Appendix A, pages 2-3