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Dr. Ryan Schwarz
Assistant Secretary for MassHealth
One Ashburton Place
Boston, MA 02108

Dear Assistant Secretary Schwarz,

On behalf of the Massachusetts Dental Society, I want to thank you and your team for the work that has gone into implementing the new MassHealth annual dental benefit structure. We recognize the significant fiscal challenges facing the Commonwealth and appreciate the efforts to preserve access to care while balancing those realities.

We were encouraged that the final budget increased the proposed annual benefit maximum and maintained important exemptions for emergency services and individuals served by the Department of Developmental Services. We also appreciate MassHealth's efforts to create additional exceptions for services such as extractions, initial complete dentures, and transition-of-care cases. These changes demonstrate a thoughtful effort to protect patients with the greatest needs.

As dentists who care for MassHealth members every day, however, we are beginning to identify areas where the current structure may unintentionally prevent patients from completing the treatment necessary to restore their oral health. From a clinical perspective, dental care is rarely a series of isolated procedures. Most treatment plans involve multiple services that work together to achieve a healthy, functional result. When some components of treatment are exempt from the annual maximum while others are not, patients can find themselves unable to complete care despite having already begun treatment.

One example is prosthetic treatment. While the exemption for initial complete dentures is greatly appreciated, many patients require replacement dentures, partial dentures, relines, rebases, or other prosthetic services to restore their ability to eat comfortably, speak clearly, and maintain proper nutrition. These services are often an essential continuation of treatment rather than elective procedures. We believe they should be considered similarly within the benefit structure.

We also believe there is an opportunity to strengthen the program by exempting preventive services that help patients avoid more extensive and costly treatment in the future. Preventive care is one of the most effective ways to improve oral health while reducing long-term expenditures.

In addition, we encourage consideration of a medical necessity exception for patients whose dental treatment is directly related to significant medical conditions or circumstances, including disability, pregnancy, recovery from substance use disorder, cancer therapy, organ transplantation, and other serious health conditions. These patients often require dental treatment as an integral part of their overall medical care, and delays or interruptions can have consequences that extend well beyond oral health.

Another concern we are hearing from our members involves access to timely benefit information. Because comprehensive treatment often occurs over multiple visits spanning several months, dentists need accurate, real-time information regarding a patient's remaining annual benefit. Enhancing the provider portal to provide current benefit utilization would allow providers to sequence treatment appropriately, counsel patients effectively, reduce administrative burdens, and help patients avoid unexpected financial responsibility.

We recognize that implementing a program of this magnitude presents challenges and that adjustments may be necessary as practical experience identifies opportunities for improvement. The Massachusetts Dental Society would appreciate your guidance on how we can best work with MassHealth to address these concerns. Our shared goal is to ensure that the benefit structure supports not only access to care, but also the successful completion of treatment that restores patients' oral health and quality of life.

Thank you again for your leadership and for your willingness to engage with the dental community. We look forward to continuing our partnership in service of the Commonwealth's most vulnerable patients.

Respectfully,

Steven Spitz, DMD
President
Massachusetts Dental Society