



TO: Oregon Health Authority  
Jeremey Vandehey, Health Policy and Analytics Director  
Stacey Schubert, Health Analytics Director  
Valerie Stewart, Health Analytics Manager  
Sara Kleinschmit, CCO Metrics Manager  
Metrics and Scoring Committee  
Amit Shah, Chair

FROM: CCO Oregon on behalf of CCOs and DCOs

DATE: September 3, 2020

SUBJECT: Provider disparity in the Preventive Dental Services measure for children

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The members of CCO Oregon respectfully ask the Metrics and Scoring Committee to reevaluate the specifications for the Members Receiving Preventive Dental Services, ages 1-5 and 6-14 measure. CCO Oregon and others supplied comments identifying the provider disparity in these specifications in January and July of 2020. The Committee has not discussed these concerns in a public forum and the Oregon Health Authority measure recommendations for 2021 do not rectify the disparity.

Currently, there is a provider disparity embedded in the specifications as FQHCs, rural health, and school-based providers count toward the measure but other primary care providers do not though the CCO is doing the same coordination with all providers, they are serving the same communities, and a goal of coordinated care is for more providers to engage, get trained, and integrate oral health.

Please see the CCO Oregon comment from January below for further detail and we are available for additional questions. We ask that the Committee takes up this conversation at the September meeting.





Yamhill Community Care Organization

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January 16, 2020

Dear Metrics and Scoring Committee Members:

Thank you for your continued efforts to incent innovation and efficacy across the coordinated care model. We know measure development and the work of the Metrics and Scoring Committee is challenging and appreciate your contribution.

With the implementation of CCO 2.0 reflecting priorities outlined by Governor Brown and policies set forth by the Oregon Health Policy Board, we are pleased that there is increased focus on integration across the coordinated care model. We also recognize the intention of this Committee to support those CCO 2.0 priorities and policies.

CCO Oregon is a member association representing payers, CCOs, and providers working across the coordinated care model. Our members are leaders in coordinated care and integration, and believe the model works. A good deal of CCO 2.0 -- from technology initiatives to reporting requirements to stakeholder engagement and workforce management -- encourages further integration. We've discussed integration from various angles in each of the workgroups CCO Oregon convenes and hosted a retreat in Fall 2019 focused on integration for behavioral and oral health stakeholders. A key takeaway from this retreat was the opportunity to further integrate care through the removal of unnecessary barriers to increase access to care, improve patient experience, and streamline care delivery to optimize cost.

The addition of two new oral health measures to the 2020 CCO Incentive measures is another opportunity to ensure we are supporting integration and the overarching goals of CCO 2.0. We appreciate that the Oregon Health Authority (OHA) did take some suggestions to improve the specifications for the Members Receiving Preventive Dental Services, ages 1-5 and 6-14 measure. However, while some changes were made, CCO Oregon members remain concerned that the current specifications undermine oral health integration in two ways: First<sup>1</sup>, it appears the specifications include just a fraction of qualifying dental providers. Second, the specifications do not include preventive oral health service by certain primary care providers, currently permissible under Oregon Administrative Rule (OAR). This limitation excludes services provided to the youngest Oregonians by their primary care providers through First Tooth and similar programs.

The First Tooth program, which is included in OAR as a covered benefit, is a key initiative supporting integration that trains medical and oral health providers to implement preventive oral health services for infants and toddlers ages three and under. Based on recommendations by the American Academy of Pediatrics, it is a key tool for CCOs to ensure their child members are able to access preventive services. Additionally, First Tooth trained primary care providers support the Foster Care Medical Home model and are able to provide both the physical and oral health assessments for the DHS metric also in the 2020 set.

While it's been explained by the OHA that school-based health centers and rural health clinics in a community or CCO-region would count toward the measure, there are other primary care providers and clinics in the same community or region that the CCO has also coordinated with that wouldn't count toward the measure. For instance, Exhibit K Section 7(c)(2) calls for the Contractor (CCO) to develop a Community Health Improvement Plan (CHP) including "a plan and strategies for improving the integration of all services provided to meet the needs of children, adolescents, and families." For many CCOs, the First Tooth program and other primary care providers may be part of that plan, but only some

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<sup>1</sup> This first concern has been addressed since January 2020. The second concern remains outstanding.

of those providers would count towards this measure. In the OARs pertinent to these services, there is no preference for providers to bill either CDT or CPT codes, but this measure as specified contradicts that and delineates difference in how and when the service would be measured, essentially creating a billing barrier. And, again, as the coordinated care model aims for system transformation and integration encourages provider types to expand preventive services and dismantle silos of care, this measure rolls back some of our collective progress.

We ask that the Metrics and Scoring Committee and the OHA modify the specifications for Members Receiving Preventive Dental Services, ages 1-5 and 6-14, to maximize integration opportunities and ensure the greatest access to oral health services for Oregon's kids.

Thank you for your time and consideration,

Samantha Shepherd  
Executive Director  
CCO Oregon