

January 7, 2022

Oregon Health Authority
500 Summer Street, NE, E-20
Salem, OR 97301

Re: 1115 Waiver

Dear Oregon Health Authority:

The vision of the Oregon 2022-2027 1115 Demonstration Waiver, meaningful progress towards health equity and a more equitable health system, offers opportunity to improve and strengthen the work accomplished in earlier waivers (CCO 1.0 and CCO 2.0), specifically:

- removing health barriers impacting the life success of Oregonians,
- expanding coverage to new populations,
- improving quality care coordination with an equity lens,
- enhancing overall health outcomes for all Oregon Health Plan Members,
- managing health care costs within an equitable funding system,
- increasing local participation and accountability.

Capitol Dental Care supports the vision of the Waiver and looks forward to being an active participant in the discussions and innovative solutions for implementation of the waiver and concept papers. We believe that the best desired result will be to strengthen and expand upon the original goals of Oregon's coordinated care model, with added focus to attain health equity for all Oregonians.

To achieve success with the proposed waiver goals and reach health equity for all Oregonians, we will need to have discussions to address several issues that will adversely impact our ability to be successful in implementing these proposals, specifically 1) Healthcare workforce; and 2) Health IT infrastructure. While these are not specifically mentioned in the waiver application, we do believe that they are key to our ability to meet the vision of the waiver.

Oregon has had a critical shortage of health care workforce across all provider types and settings, including dental. These shortages have only been and will continue to be exacerbated by the COVID pandemic, which has prompted additional issues of compassion fatigue, moral fatigue and attrition among the current healthcare workforce. Without a collective discussion and development of statewide strategies to address the healthcare workforce, including addressing burnout, retention and equitable recruitment, reaching the vision of this waiver will be compromised.

Further, quality care coordination, including referrals across both the health care system and social services agencies, will not be as successful as desired without an improved and expanded IT infrastructure. Supporting, enhancing and prioritizing the work of the Health Information Technology Oversight Committee is critical to the transformation of truly coordinated care delivery to provide an

ongoing quality member experience. It will also support and enhance the health and social services workforces in their efforts to provide the best care coordination.

Dental Specific Comments

As a Dental Care Organization, we feel that several comments about oral health are important. We are excited to see that our recommendation from our July, 2021 comments on the Waiver Concept Papers to *“Consistently recognize the importance of oral health in the overall health of Oregonians”* was noted and the Waiver Application does include more consistent references to oral health as part of the Oregon Health Plan benefits along with physical and behavioral health. Oral health is critical for attainment of overall individual and population health in an equity-focused system and it is a key component in evaluating and addressing social determinants of health (SDOH).

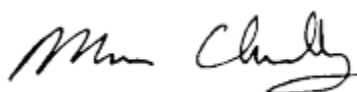
We are very supportive of the following strategies, and believe oral health has a key role in being successful in accomplishing them:

- 1) “Proposed Change 3.2 Improving Health Outcomes by Streamlining Life and Coverage Transitions, Strategy 1: Obtain expenditure authority to allow people in custody to access Medicaid benefits,”
- 2) “Proposed Change 3.2 Improving Health Outcomes by Streamlining Life and Coverage Transitions, “Strategy 3: Provide a defined set of SDOH services based on transition-related criteria to support vulnerable populations in need during transitions,” and
- 3) Section IV, Benefits and Cost Sharing; Social Determinants of Health Support Services, specifically Housing and Employment

While the references #1 and #2 above are about the Oregon Health Plan coverages, which do include dental care, it is important to understand that the oral health benefits are critical, not only for the individual’s immediate care and overall health, but these oral health benefits are also critical to referenced SDOH services in #3 above. Studies have shown that when an individual has a healthy mouth and smile, their confidence increases and their ability to have success in school, improved social interactions, and in obtaining housing and employment are enhanced, and prevents regressive outcomes in their health and overall well-being.

Capitol Dental Care supports the waiver application and looks forward to collaborating with OHA, our CCO partners and other interested parties in the implementation of the vision of meaningful progress towards health equity and a more equitable healthcare system. We appreciate the opportunity to provide comments and consideration of them. Thank you!

Sincerely,

A handwritten signature in black ink, appearing to read "Manu Chaudhry".

Manu Chaudhry, MS, DDS
President
Capitol Dental Care, Inc.