



Governor's Advisory Council for Exceptional Citizens (GACEC) 516 West Loockerman St., Dover, DE 19904  
302-739-4553 (voice) 302-739-6126 (fax) <http://www.gacec.delaware.gov>

January 27, 2020

Nicole Cunningham  
Planning, Policy and Quality Unit  
Division of Medicaid and Medical Assistance  
1901 North DuPont Highway/P O Box 906  
New Castle, DE 19720-0906

**RE: 23 DE Reg. 523 [DHSS/DMMA Proposed Adult Dental Services Regulation (January 1, 2020)]**

Dear Ms. Cunningham:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the proposed DHSS/DMMA amendment of the Title XIX Medicaid State Plan and the Alternative Benefit Plan (ABP) regarding dental services. This amendment will specifically add adult dental services and maintain the assurance of the State that the ABP matches regular Medicaid. Council **endorses** the proposed amendment; however, we would like to share the following observations.

The language in the amendment seems to only focus on amending the state plan with CMS to allow for coverage of the dental benefit. Council is hopeful that DMMA will disseminate more extensive regulations elaborating on the program soon. In the meantime, Council notes that it is important for future regulations to specify the process, such as what would constitute emergency coverage and how authorization will be given for services beyond the \$1500.00 maximum.

After reviewing the fees noted in the proposed amendment, Council queries whether there is evidence that there are dentists available who will accept the payments indicated for services.

Thank you for your time and consideration of our support and our questions. Please feel free to contact me or Wendy Strauss should you have any questions on our comments.

Sincerely,

*Ann C Fisher*

Ann C. Fisher  
Chairperson

ACF: kpc