



COMMONWEALTH OF VIRGINIA  
*Virginia Board for People with Disabilities*

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November 12, 2013

TO: Jaime Hoyle, Senior Staff Attorney/Health Policy Analyst  
Joint Commission on Health Care

FROM: Heidi Lawyer

A handwritten signature in blue ink, appearing to read "Heidi Lawyer".

RE: Proposed Policy Options for Dental Services

The Virginia Board for People with Disabilities (the Board) would like to offer comment regarding proposed policy options for dental services arising from the study on costs of untreated dental disease in the Commonwealth, as presented at your October 24<sup>th</sup> meeting. As Virginia's Developmental Disabilities Council, the Board applauds and thanks the Joint Commission's exploration and study of the issues of untreated dental disease.

For adult Virginians with developmental and other disabilities who receive Medicaid, as well as for childless adults whose income is at or below the Federal Poverty Level, access to dental services is problematic. The Board has long advocated for coverage of dental services for adults under Medicaid as a recommendation in each of the three editions of its comprehensive report, *Assessment of the Disability Services System in Virginia* (2006, 2008 & 2011).

The Board strongly supports approval of **Insurance Option #2**: "Introduce a budget amendment for \$30,255,000 GFs and \$30,255,000 NGFs in FY 2015 and \$63,535,499 GFs and \$63,535,499 NGFs in FY 2016 to expand Medicaid to include full dental coverage for adults."

We recognize that weaker than expected revenue reports are a concern. In the event of ongoing fiscal strain, the Board would support the more incremental approach of **Insurance Option #3**, a more limited expansion of Medicaid for preventative dental services for adults, with the future pursuit of eventual inclusion and funding of all dental services under Medicaid for adults.

Letter to Jaime Hoyle, JCHC

November 12, 2013

Page 2

The Board also supports **Access Option #4**, “*Include a targeted study of the dental capacity of Virginia’s safety net providers...*” We encourage and recommend inclusion of the Virginia Dental Hygienists Association as a partner in need determination as well as tele-dentistry and workforce initiatives. Access Option #4 would facilitate expansion of preventative services by dental hygienists within their existing scope of practice while remaining under the supervision of a dentist, albeit off site and making necessary referrals for direct care.

Use of dental hygienists has helped expand access to preventative care, especially in rural areas in other states. To our understanding, this practice is already occurring through the Virginia Department of Health’s (VDH) Dental Health Program. Through changes to *Code of Virginia §54.1-2722* in 2009, licensed dental hygienists employed by VDH were allowed to provide educational and preventative dental care under remote supervision of a dentist also employed by the VDH. Pilot projects were established for such services using protocol developed by the VDH Commissioner in three Health Districts designated as Dental Health Professional Shortage Areas—Cumberland Plateau, Southside and Lenowisco. In 2012 the Board of Health adopted the protocol as regulation, and the use of dental hygienists for preventative and educational care was expanded statewide.

Thank you for this opportunity to comment. I am available to you or the Commission members to answer any questions by phone at (804) 786-9369 or by email at [Heidi.Lawyer@vbpd.virginia.gov](mailto:Heidi.Lawyer@vbpd.virginia.gov).

Cc: The Honorable William Hazel, MD  
Secretary of Health and Human Services