

Centers for Medicare & Medicaid Services DENTAL MANAGED CARE Network Adequacy Certification

Prepared by the California Department of Health Care Services

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Executive Summary

The Department of Health Care Services (DHCS) conducted a comprehensive review of the provider networks for each of the six contracted Dental Managed Care (DMC) plans and has concluded that all DMC plan provider networks are compliant with the annual network certification requirements set forth in Title 42, Code of Federal Regulations, Section 438.207. Federal and state laws and regulations establish state-specified network adequacy standards, which DMC plans are required to comply with as specified in the DMC contracts. DMC plans are known as Geographic Managed Care (GMC) in Sacramento County, and Prepaid Health Plans (PHP) in Los Angeles County. DHCS' network evaluation consisted of a review of the DMC plans' ability to maintain a network of providers that is sufficient in number, mix, and geographic distribution to meet the needs of the anticipated number of members in both Sacramento and Los Angeles counties.

Description of Sacramento County

Sacramento County is located in Northern California Central Valley at the base of the Sierra Nevada. Sacramento County has a total area of 994 square miles and borders Sutter County to the north, El Dorado County to the northeast, Amador County to the southeast, San Joaquin County to the south, Contra Costa County to the southwest, Solano County to the west and Yolo County to the northwest. As of July 1, 2019, the United States Census Bureau estimates that Sacramento County had a population of 1,552,058.

Description of Los Angeles County

Los Angeles County is the most populous county in the United States (U.S.), with more than 10 million residents as of July 1, 2019. Its population is larger than that of 41 individual states. It has 88 incorporated cities and many unincorporated areas and at 4,083 square miles, it is larger than the combined areas of the states of Delaware and Rhode Island. The county is home to more than one-quarter of California residents and is one of the most ethnically diverse counties in the U.S.

Projected Enrollment

The network evaluation took into account each DMC plan's ability to meet the needs of the anticipated number by members in Sacramento and Los Angeles counties. To evaluate whether DMC plans have a sufficient number of providers to meet the anticipated enrollment, DHCS reviewed enrollment trends from the previous three fiscal years and assumed that trends within DMC plans would remain consistent.

Provider Network Evaluation

Members enrolled in DMC are assigned a Primary Care Dentist (PCD) when joining a DMC plan, either by choice or automatic assignment. Members are able to change their PCD at any time. For the purposes of this certification, General Dentists are considered PCDs. DHCS reviewed each DMC plan's network within both Sacramento and Los Angeles counties to verify compliance with the DMC contract as well as federal and state laws and regulations. DHCS evaluated the DMC plans' provider networks to assess members' access to PCDs, specialty care dentists, and other providers of dental covered services (e.g. safety net clinics, etc.). In order for DMC plans to meet network access requirements, they must demonstrate compliance with following provider to member ratios, time and distance standards, and timely access standards:

Network Capacity – Provider to Member Ratios

DMC plans must demonstrate compliance with provider to member ratios pursuant to the DMC contract, Exhibit A, Attachment 8.B (Provider to Member Ratios). All DMC plans must demonstrate there is one full-time equivalent PCD to every 2,000 members, and one full-time equivalent network dentist (PCDs and specialists combined) to every 1,200 members within each service area. DMC plans must either meet or exceed the network capacity requirements and proportionately adjust the number of network providers to support any anticipated changes in enrollment. To validate that the providers listed on the DMC plans' reported networks provide services to enrolled plan members, DHCS requested and reviewed provider contracts for a random sample of primary and specialty dental providers. DHCS confirmed that the DMC plans' reported networks far exceeded the required provider to member ratios and would still have the capacity to serve members even with a substantial increase in projected enrollment or decrease in provider participation. (See Figure 1.)

Geographic Network Distribution – Time and Distance Standards

DMC plans must demonstrate compliance with the time and distance standards pursuant to the DMC contract, Exhibit A, Attachment 8.E (Time and Distance Standard) on an annual basis or any time there has been a significant change in its operations that would affect the adequacy of capacity and services. DMC plans must maintain a network of PCDs that are located within 10 miles and 30 minutes from a member's residence unless the DMC plan has an approved alternative time and distance standard. DHCS utilized Geographic Information Systems (GIS) software to validate and evaluate the geographic distribution of PCD provider networks for children and adults for DMC plans in Sacramento and Los Angeles counties. With the exception of 8 zip codes in Sacramento County and 19 zip codes in Los Angeles County for which alternate access standards (AAS) have been approved by DHCS, all other zip codes within these networks met the contractual requirements for time and distance standards for eligible members, thereby demonstrating an adequate network. (See Figure 2.)

Appointment Availability – Timely Access Standards

DMC plans must demonstrate compliance with timely access standards pursuant to the DMC contract, Exhibit A, Attachment 11.B (Access Requirements). All Plan Letter (APL)

18-003E¹ further requires all DMC plans to submit a quarterly Timely Access and Specialty Referrals Report to DHCS to demonstrate compliance with the following appointment types:

- Initial Appointment – 4 weeks
- Routine Appointment (non-emergency) – 4 weeks
- Preventive Dental Care Appointment – 4 weeks
- Specialist Appointment (adult) – 30 **business** days
- Specialist Appointment (children) – 30 **calendar** days
- Emergency Appointment – 24 hours

State law and federal regulations establish DMC plans' timely access responsibility. DMC plans must ensure continual compliance by monitoring network providers regularly and requiring corrective action when compliance is not being met. To assess compliance with these timely access standards, DHCS reviewed the DMC plans' quarterly reports and validated full implementation of the DMC plans' internal follow-up procedures and re-measurement activities to ensure timely access to primary and specialty dental care. DHCS confirmed that all six DMC plans demonstrated compliance with the timely access standards for all appointment types. (See Figure 3.)

Specialist Network and Out-of-Network Access

To evaluate whether DMC plans meet the required ratio of one full-time equivalent network dentist to every 1,200 members, DHCS incorporated the following provider types into its calculations: endodontists, oral surgeons, orthodontists, pedodontists, periodontists, and prosthodontists. While there are no established ratios for dental specialties delineated in either federal or state laws, DHCS evaluated the specialist network for each DMC plan. Based on the network evaluation, DHCS concluded that DMC plans have an adequate specialist network in place to ensure access to specialty services. DHCS further reviewed DMC plans' policies and procedures to confirm that DMC plans have the ability, when required, to provide members with out-of-network access when services are not available within the network. (See Figure 4.)

Federally Qualified Health Centers (FQHC), Rural Health Clinics (RHC), and Indian Health Service (IHS) Facilities

DMC plans must conduct outreach to subcontract with FQHCs, RHCs, and IHS facilities and include them as part of their provider network pursuant to the DMC contract, Exhibit A, Attachment 8.L (Subcontracts with FQHC/RHC). DMC plans are contracted with FQHCs, RHCs, and IHS facilities in Sacramento and Los Angeles counties. DHCS monitors all DMC plans to ensure contracts are in place with existing facilities. (See Figure 5.)

¹ Dental Managed Care All Plan Letters.

<http://www.dhcs.ca.gov/services/Pages/DentalAllPlanLetters.aspx>

APPENDIX

Attachment A: Access Dental Plan

Attachment B: Health Net of California, Inc.

Attachment C: Liberty Dental Plan of California, Inc.

Figure 1: Provider to Member Ratios

Sacramento County

Provider Type	Dentists	Enrollees	Provider to Member Ratio	Required Standard	Standard Met
Primary Care Dentists	117	122,066	1:1,043	1:2,000	Yes
Total Dentists	137	122,066	1:891	1:1,200	Yes

*Source: Plan Provider Network Report (Mar 2020); DHCS Data Warehouse (Mar 2020).

Los Angeles County

Provider Type	Dentists	Enrollees	Provider to Member Ratio	Required Standard	Standard Met
Primary Care Dentists	690	132,017	1:191	1:2,000	Yes
Total Dentists	936	132,017	1:141	1:1,200	Yes

*Source: Plan Provider Network Report (Mar 2020); DHCS Data Warehouse (Mar 2020).

Figure 2: Time and Distance Standards

Sacramento County

Population	Required Standard	Standard Met
Adults	10 miles/30 minutes	Yes ²
Children	10 miles/30 minutes	Yes ³

*Source: DHCS Geo Maps (Jan 2020).

Los Angeles County

Population	Required Standard	Standard Met
Adults	10 miles/30 minutes	Yes ⁴
Children	10 miles/30 minutes	Yes ⁵

*Source: DHCS Geo Maps (Jan 2020).

On July 22, 2020, Access submitted AAS requests for 8 zip codes in Sacramento County and 15 zip codes in Los Angeles County. Upon evaluation and consideration of the number of members affected, the location of the nearest network provider, and the lack of dental offices and/or fee-for-service providers in the area, DHCS approved the following AAS requests:

² Standard met with AAS approval.

³ Standard met with AAS approval.

⁴ Standard met with AAS approval.

⁵ Standard met with AAS approval.

Sacramento County – AAS Approvals

Zip Code	County	Region	PCD Type	AAS
95615	Sacramento	Courtland	Adult; Pediatric	32 miles/35 minutes
95757	Sacramento	Elk Grove	Adult; Pediatric	20 miles
95698	Sacramento	Herald	Adult; Pediatric	21 miles
95641	Sacramento	Isleton	Adult; Pediatric	37 miles/35 minutes
95680	Sacramento	Ryde	Adult; Pediatric	27 miles
95683	Sacramento	Sloughhouse	Adult; Pediatric	27 miles
95690	Sacramento	Walnut Grove	Adult; Pediatric	40 miles/37 minutes
95693	Sacramento	Wilton	Adult; Pediatric	23 miles

Los Angeles County – AAS Approvals

Zip Code	County	Region	PCD Type	AAS
93510	Los Angeles	Acton	Adult; Pediatric	29 miles
91702	Los Angeles	Azusa	Adult; Pediatric	26 miles
93532	Los Angeles	Lake Hughes	Adult; Pediatric	45 miles/39 minutes
93535	Los Angeles	Lancaster	Adult; Pediatric	40 miles/31 minutes
93536	Los Angeles	Lancaster	Adult; Pediatric	51 miles/50 minutes
93551	Los Angeles	Leona Valley	Adult; Pediatric	18 miles
93543	Los Angeles	Littlerock	Adult; Pediatric	25 miles
93544	Los Angeles	Llano	Adult; Pediatric	39 miles/34 minutes
90265	Los Angeles	Malibu	Adult; Pediatric	28 miles/33 minutes
93550	Los Angeles	Palmdale	Adult; Pediatric	23 miles
93591	Los Angeles	Palmdale	Adult; Pediatric	39 miles
93553	Los Angeles	Pearblossom	Adult; Pediatric	27 miles
91390	Los Angeles	Santa Clarita	Adult; Pediatric	29 miles
91042	Los Angeles	Tujunga	Adult; Pediatric	24 miles/92 minutes
93563	Los Angeles	Valyermo	Adult; Pediatric	30 miles

Figure 3: Timely Access Standards

Appointment Type	Required Standard	Standard Met (Sacramento County)	Standard Met (Los Angeles County)
Initial	4 weeks	Yes	Yes
Routine	4 weeks	Yes	Yes
Preventive	4 weeks	Yes	Yes
Specialist (adults)	30 business days	Yes	Yes
Specialist (children)	30 calendar days	Yes	Yes
Emergency	24 hours	Yes	Yes

*Source: Plan Timely Access Deliverable (Q4 2019).

Figure 4: Contracted Specialists

Provider Type	Sacramento County	Los Angeles County
Specialists ⁶	30	331

*Source: Plan Provider Network Report (Mar 2020).

Figure 5: Federally Qualified Health Centers (FQHC), Rural Health Clinics (RHC), and Indian Health Service (IHS) Facilities

Type	Sacramento County	Los Angeles County
FQHCs/RHCs	11	66
IHS Facilities	1	0 ⁷

*Source: Plan Provider Network Report (Mar 2020).

⁶ Specialist network is comprised of: endodontists, oral surgeons, orthodontists, pedodontists, periodontists, and prosthodontists.

⁷ The plan must permit Indian enrollees to obtain covered services from out-of-network (OON) Indian Health Care Providers (IHCP) and pay for those services.

Figure 1: Provider to Member Ratios

Sacramento County

Provider Type	Dentists	Enrollees	Provider to Member Ratio	Required Standard	Standard Met
Primary Care Dentists	159	127,369	1:801	1:2,000	Yes
Total Dentists	209	127,369	1:609	1:1,200	Yes

*Source: Plan Provider Network Report (Mar 2020); DHCS Data Warehouse (Mar 2020).

Los Angeles County

Provider Type	Dentists	Enrollees	Provider to Member Ratio	Required Standard	Standard Met
Primary Care Dentists	566	166,955	1:295	1:2,000	Yes
Total Dentists	742	166,955	1:225	1:1,200	Yes

*Source: Plan Provider Network Report (Mar 2020); DHCS Data Warehouse (Mar 2020).

Figure 2: Time and Distance Standards

Sacramento County

Population	Required Standard	Standard Met
Adults	10 miles/30 minutes	Yes ⁸
Children	10 miles/30 minutes	Yes ⁹

*Source: DHCS Geo Maps (Jan 2020).

Los Angeles County

Population	Required Standard	Standard Met
Adults	10 miles/30 minutes	Yes ¹⁰
Children	10 miles/30 minutes	Yes ¹¹

*Source: DHCS Geo Maps (Jan 2020).

On July 17, 2020, Health Net submitted AAS requests for 8 zip codes in Sacramento County and 17 zip codes in Los Angeles County. Upon evaluation and consideration of the number of members affected, approval of AAS requests in previous years, the location of the nearest network provider, and the lack of dental offices and/or fee-for-service providers in the area, DHCS approved the following AAS requests:

⁸ Standard met with AAS approval.

⁹ Standard met with AAS approval.

¹⁰ Standard met with AAS approval.

¹¹ Standard met with AAS approval.

Sacramento County – AAS Approvals

Zip Code	County	Region	PCD Type	AAS
95615	Sacramento	Courtland	Adult; Pediatric	29 miles/31 minutes
95757	Sacramento	Elk Grove	Adult; Pediatric	18 miles
95698	Sacramento	Herald	Adult; Pediatric	21 miles
95641	Sacramento	Isleton	Adult; Pediatric	49 miles/46 minutes
95680	Sacramento	Ryde	Adult; Pediatric	27 miles
95683	Sacramento	Sloughhouse	Adult; Pediatric	28 miles
95690	Sacramento	Walnut Grove	Adult; Pediatric	38 miles/41 minutes
95693	Sacramento	Wilton	Adult; Pediatric	24 miles

Los Angeles County – AAS Approvals

Zip Code	County	Region	PCD Type	AAS
93510	Los Angeles	Acton	Adult; Pediatric	24 miles
91702	Los Angeles	Azusa	Adult; Pediatric	26 miles
91384	Los Angeles	Castaic	Adult; Pediatric	20 miles
93532	Los Angeles	Lake Hughes	Adult; Pediatric	44 miles/38 minutes
93535	Los Angeles	Lancaster	Adult; Pediatric	46 miles/40 minutes
93536	Los Angeles	Lancaster	Adult; Pediatric	49 miles/37 minutes
93243	Los Angeles	Lebec	Adult; Pediatric	52 miles/34 minutes
93543	Los Angeles	Littlerock	Adult; Pediatric	24 miles
93544	Los Angeles	Llano	Adult; Pediatric	39 miles/35 minutes
90263	Los Angeles	Malibu	Adult; Pediatric	20 miles
90265	Los Angeles	Malibu	Adult; Pediatric	29 miles/31 minutes
91759	Los Angeles	Mt. Baldy	Adult; Pediatric	20 miles
93591	Los Angeles	Palmdale	Adult; Pediatric	37 miles/36 minutes
93553	Los Angeles	Pearblossom	Adult; Pediatric	23 miles
91390	Los Angeles	Santa Clarita	Adult; Pediatric	29 miles
91042	Los Angeles	Tujunga	Adult; Pediatric	29 miles/98 minutes
93563	Los Angeles	Valyermo	Adult; Pediatric	24 miles

Figure 3: Timely Access Standards

Appointment Type	Required Standard	Standard Met (Sacramento County)	Standard Met (Los Angeles County)
Initial	4 weeks	Yes	Yes
Routine	4 weeks	Yes	Yes
Preventive	4 weeks	Yes	Yes
Specialist (adults)	30 business days	Yes	Yes
Specialist (children)	30 calendar days	Yes	Yes
Emergency	24 hours	Yes	Yes

*Source: Plan Timely Access Deliverable (Q4 2019).

Figure 4: Contracted Specialists

Provider Type	Sacramento County	Los Angeles County
Specialists ¹²	50	176

*Source: Plan Provider Network Report (Mar 2020).

Figure 5: Federally Qualified Health Centers (FQHC), Rural Health Clinic (RHC), and Indian Health Service (IHS) Facilities

Type	Sacramento County	Los Angeles County
FQHCs/RHCs	12	52
IHS Facilities	1	0 ¹³

*Source: Plan Provider Network Report (Mar 2020).

¹² Specialist network is comprised of: endodontists, oral surgeons, orthodontists, pedodontists, periodontists, and prosthodontists.

¹³ The plan must permit Indian enrollees to obtain covered services from OON IHCPs and pay for those services.

Figure 1: Provider to Member Ratios

Sacramento County

Provider Type	Dentists	Enrollees	Provider to Member Ratio	Required Standard	Standard Met
Primary Care Dentists	166	162,842	1:981	1:2,000	Yes
Total Dentists	216	162,842	1:754	1:1,200	Yes

*Source: Plan Provider Network Report (Mar 2020); DHCS Data Warehouse (Mar 2020).

Los Angeles County

Provider Type	Dentists	Enrollees	Provider to Member Ratio	Required Standard	Standard Met
Primary Care Dentists	842	60,082	1:71	1:2,000	Yes
Total Dentists	1,019	60,082	1:59	1:1,200	Yes

*Source: Plan Provider Network Report (Mar 2020); DHCS Data Warehouse (Mar 2020).

Figure 2: Time and Distance Standards

Sacramento County

Population	Required Standard	Standard Met
Adults	10 miles/30 minutes	Yes ¹⁴
Children	10 miles/30 minutes	Yes ¹⁵

*Source: DHCS Geo Maps (Jan 2020).

Los Angeles County

Population	Required Standard	Standard Met
Adults	10 miles/30 minutes	Yes ¹⁶
Children	10 miles/30 minutes	Yes ¹⁷

*Source: DHCS Geo Maps (Jan 2020).

On July 16, 2020, Liberty submitted AAS requests for 8 zip codes in Sacramento County and 12 zip codes in Los Angeles County. Upon evaluation and consideration of the number of members affected, approval of AAS requests in previous years, the location of the nearest network provider, and the lack of dental offices and/or fee-for-service providers in the area, DHCS approved the following AAS requests:

¹⁴ Standard met with AAS approval.

¹⁵ Standard met with AAS approval.

¹⁶ Standard met with AAS approval.

¹⁷ Standard met with AAS approval.

Sacramento County – AAS Approvals

Zip Code	County	Region	PCD Type	AAS
95615	Sacramento	Courtland	Adult; Pediatric	28 miles
95757	Sacramento	Elk Grove	Adult; Pediatric	21 miles
95638	Sacramento	Herald	Adult; Pediatric	31 miles
95641	Sacramento	Isleton	Adult; Pediatric	52 miles/46 minutes
95680	Sacramento	Ryde	Adult; Pediatric	27 miles
95683	Sacramento	Sloughhouse	Adult; Pediatric	32 miles
95690	Sacramento	Walnut Grove	Adult; Pediatric	38 miles/38 minutes
95693	Sacramento	Wilton	Adult; Pediatric	22 miles

Los Angeles County – AAS Approvals

Zip Code	County	Region	PCD Type	AAS
93510	Los Angeles	Acton	Adult; Pediatric	25 miles
93532	Los Angeles	Lake Hughes	Adult; Pediatric	47 miles/64 minutes
93535	Los Angeles	Lancaster	Adult; Pediatric	38 miles
93536	Los Angeles	Lancaster	Adult; Pediatric	47 miles/37 minutes
93543	Los Angeles	Littlerock	Adult; Pediatric	23 miles
93544	Los Angeles	Llano	Adult; Pediatric	30 miles/31 minutes
90265	Los Angeles	Malibu	Adult; Pediatric	26 miles
93591	Los Angeles	Palmdale	Adult; Pediatric	37 miles
93553	Los Angeles	Pearblossom	Adult; Pediatric	22 miles
91390	Los Angeles	Santa Clarita	Adult; Pediatric	28 miles
91042	Los Angeles	Tujunga	Adult; Pediatric	26 miles/94 minutes
93563	Los Angeles	Valyermo	Adult; Pediatric	37 miles

Figure 3: Timely Access Standards

Appointment Type	Required Standard	Standard Met (Sacramento County)	Standard Met (Los Angeles County)
Initial	4 weeks	Yes	Yes
Routine	4 weeks	Yes	Yes
Preventive	4 weeks	Yes	Yes
Specialist (adults)	30 business days	Yes	Yes
Specialist (children)	30 calendar days	Yes	Yes
Emergency	24 hours	Yes	Yes

*Source: Plan Timely Access Deliverable (Q4 2019).

Figure 4: Contracted Specialists

Provider Type	Sacramento County	Los Angeles County
Specialists ¹⁸	50	177

*Source: Plan Provider Network Report (Mar 2020).

Figure 5: Federally Qualified Health Centers (FQHC), Rural Health Clinics (RHC), and Indian Health Service (IHS) Facilities

Type	Sacramento County	Los Angeles County
FQHCs/RHCs	11	53
IHS Facilities	1	0 ¹⁹

*Source: Plan Provider Network Report (Mar 2020).

¹⁸ Specialist network is comprised of: endodontists, oral surgeons, orthodontists, pedodontists, periodontists, and prosthodontists.

¹⁹ The plan must permit Indian enrollees to obtain covered services from OON IHCPs and pay for those services.