



January 8, 2019

Health Policy Commission  
Attn: Catherine Harrison  
50 Milk Street, 8th Floor  
Boston, MA 02109

*Submitted electronically to [HPC-Certification@mass.gov](mailto:HPC-Certification@mass.gov)*

Steering Committee Members

*American Academy of Pediatrics,  
Massachusetts Chapter*

*Better Oral Health for Massachusetts  
Coalition*

*Boston Benefit Partners*

*Boston Children's Hospital*

*Boston Public Health Commission  
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Prevention of Cruelty to Children*

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*Tufts Dental Facilities*

*Tufts University School of Dental  
Medicine*

*University of Massachusetts Medical  
School*

**Re: Proposed 2019 HPC ACO Certification Standards**

On behalf of the members of the Oral Health Advocacy Taskforce (OHAT), thank you for the opportunity to offer our comments on the Proposed 2019 Health Policy Commission Accountable Care Organization (HPC ACO) Certification Standards. As you know, OHAT is a longstanding coalition of diverse stakeholders dedicated to improving the oral health of the Commonwealth by supporting policies that advance health care justice and access to affordable, accessible, and high quality oral health, particularly for the most vulnerable populations of Massachusetts. An important component of our work is to promote the integration of oral health into the broader health care system as means of improving overall health and wellbeing.

We are grateful to the HPC for including oral health integration as an “emerging topic” for consideration within the 2019 ACO certification standards. However, we would also urge you to prioritize this important topic going forward, in a manner similar to that included in the HPC “ACO Certification Criteria Updates for Discussion” from the October 2018 meeting. During that meeting, the revised supplemental information standards on oral health integration included specific questions for the ACOs that we believe will be vital for ensuring that they deliver truly integrated and coordinated care to their patients.

This is particularly important given that the MassHealth ACO program specifically includes an oral health quality metric in their quality measure slate during the current MassHealth section 1115 demonstration waiver period. This metric has been validated by the American Dental Association (ADA) and is described as an *Oral Health Evaluation*, measured by the “percentage of members under age 21 years who receive a comprehensive or periodic oral evaluation within the reporting year.” This particular metric is unique because the evaluation must be provided by a dentist and not a primary care provider.

Since the majority of MassHealth ACOs are led by an academic medical center or teaching hospital and tend not to have comprehensive dental services available on-site, the ACOs (and dental providers) must be educated and incentivized to form referral circles/collaborations with community-based dentists to meet the oral health needs of their assigned patients and satisfy the quality metric. In other words, inclusion of this metric requires that the MassHealth ACOs identify collaborations/partnerships with dental providers to successfully meet the quality benchmark and to provide authentic whole-person care across the continuum of a patient's needs.

Furthermore, the HPC is tasked with setting state standards that encourage the provision of value-based, high-quality, and cost-effective health care. As such, we urge you to comprehensively include oral health integration in the certification standards criteria for ACOs going forward.

We look forward to working with the HPC to promote a truly integrated, coordinated and accountable health care system that includes oral health and dental services. Thank you again for the opportunity to provide our feedback on the issue of oral health integration into ACO certification standards in Massachusetts. If you have questions or would like more information, please contact Dr. Neetu Singh at [nsingh@hcfama.org](mailto:nsingh@hcfama.org) or 617-275-2801.

Sincerely,



Neetu Singh DMD, MPH  
Oral Health Program Director  
Health Care For All

cc: Health Policy Commission Board of Directors