

**MEDICAID POLICY INFORMATION SHEET**

**Policy Analyst:** Elizabeth Pitts

**Phone Number:** 517-284-0842

Initial

Public Comment

Final

**Brief description of policy:**

This bulletin provides information related to the enrollment and coverage of dental services of licensed dental therapists.

**Reason for policy (problem being addressed):**

Recent changes to the Public Health Code created licensed dental therapists as a new mid-level dental provider type in Michigan. Dental therapists are required to practice in public health settings (Federally Qualified Health Centers, Tribal Health Centers, Local Health Departments, etc.) or underserved areas where at least 50% of the patients being treated are Medicaid-eligible or uninsured. This policy aligns with the Public Health Code and allows dental therapists to enroll in Medicaid and be reimbursed for their services.

**Budget implication:**

budget neutral

will cost MDHHS \$ , and (select one) budgeted in current appropriation

will save MDHHS \$

**Is this policy change mandated per federal requirements?**

No

**Does policy have operational implications on other parts of MDHHS?**

No

**Does policy have operational implications on other departments?**

No

**Summary of input:**

controversial

acceptable to most/all groups

limited public interest/comment

**Supporting Documentation:**

State Plan Amendment Required: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please provide status: <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Pending <input type="checkbox"/> Denied Date: 11/18/21	Public Notice Required: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, Submission Date: <b>5/30/21</b>
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<b>DRAFT FOR PUBLIC COMMENT</b>		
	<b>Michigan Department of Health and Human Services</b>	<b>Project Number:</b> 2215-Dental   <b>Date:</b> June 8, 2022

**Comments Due:** July 13, 2022  
**Proposed Effective Date:** September 1, 2022  
**Direct Comments To:** Elizabeth Pitts  
**Address:**  
**E-Mail Address:** [pittse@michigan.gov](mailto:pittse@michigan.gov)  
**Phone:** 517-284-0842 | **Fax:**

<p><b>Policy Subject:</b> Program Enrollment of Dental Therapists</p> <p><b>Affected Programs:</b> Medicaid, MICHild, Healthy Michigan Plan, Children’s Special Health Care Services (CSHCS)</p> <p><b>Distribution:</b> Dentists, Dental Clinics, Dental Health Plans, Medicaid Health Plans, Integrated Care Organizations, Federally Qualified Health Centers, Tribal Health Centers, Local Health Departments</p> <p><b>Summary:</b> This bulletin provides information related to the enrollment and coverage of dental services of licensed dental therapists.</p> <p><b>Purpose:</b> Recent changes to the Public Health Code created licensed dental therapists as a new mid-level dental provider type in Michigan. Dental therapists are required to practice in public health settings (Federally Qualified Health Centers, Tribal Health Centers, Local Health Departments, etc.) or underserved areas where at least 50% of the patients being treated are Medicaid-eligible or uninsured. This policy aligns with the Public Health Code and allows dental therapists to enroll in Medicaid and be reimbursed for their services.</p> <p><b>Cost Implications:</b> Budget neutral because these services are already covered.</p> <p><b>Potential Hearings &amp; Appeal Issues:</b> None</p>
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<b>State Plan Amendment Required:</b> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <b>If yes, date submitted:</b> 11/18/21	<b>Public Notice Required:</b> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <b>Submitted date:</b> 5/30/21
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**Tribal Notification:** Yes  No  - **Date:** 4/16/21

**THIS SECTION COMPLETED BY RECEIVER**

<input type="checkbox"/> <b>Approved</b>	<input type="checkbox"/> <b>No Comments</b>
<input type="checkbox"/> <b>Disapproved</b>	<input type="checkbox"/> <b>See Comments Below</b>
	<input type="checkbox"/> <b>See Comments in Text</b>

<b>Signature:</b>	<b>Phone Number</b>
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**Signature Printed:**

**Bureau/Administration** *(please print)*

**Date**

**Comment001**

**Revised 6/16**

# Proposed Policy Draft

Michigan Department of Health and Human Services  
Behavioral & Physical Health and Aging Services Administration

**Distribution:** Dentists, Dental Clinics, Dental Health Plans, Medicaid Health Plans, Integrated Care Organizations, Federally Qualified Health Centers, Tribal Health Centers, Local Health Departments

**Issued:** August 1, 2022 (Proposed)

**Subject:** Program Enrollment of Dental Therapists

**Effective:** September 1, 2022 (Proposed)

**Programs Affected:** Medicaid, MIChild, Healthy Michigan Plan, Children's Special Health Care Services (CSHCS)

This bulletin provides information related to the enrollment and coverage of dental services of licensed dental therapists. The bulletin also provides information related to the written practice agreement, a program requirement for dental therapists. The information in this bulletin is effective for dates of service on and after September 1, 2022.

## **General Information for Services Provided by the Dental Therapist**

The Medicaid program covers medically necessary dental services provided by a Medicaid-enrolled dental therapist, as defined in §16656 of Public Act (PA) 368 of 1978 as amended, when all the following requirements are met:

- The services are performed by a person who is licensed as a dental therapist under State law;
- The dental therapist is legally authorized to perform the service in compliance with State law;
- The services are performed under the supervision of a Medicaid-enrolled dentist within the terms of the written practice agreement;
- The services are not restricted to dentists or otherwise excluded by Medicaid program policy or by federal and state statutes; and
- The services are performed in health settings as defined in PA 368 of 1978.

Dental services are only covered when the dental therapist has personally performed the service and no other provider or entity has billed or been paid for the service.

## **Enrollment of Dental Therapists**

A dental therapist who provides dental services to Medicaid beneficiaries is required to be a Medicaid-enrolled provider and uniquely identified on claims. To enroll as a Medicaid provider,

the dental therapist must complete an online application in the Community Health Automated Medicaid Processing System (CHAMPS) and enroll with an Individual (Type 1) National Provider Identifier (NPI).

During the enrollment and enrollment revalidation processes, the dental therapist must report the NPI of their Medicaid-enrolled supervising dentist by including the supervising dentist's NPI on the checklist and associating to the supervising dentist in the "Associate to Billing Provider/Other Association" step in CHAMPS. Disenrollment of the supervising dentist from the Medicaid program may prompt disenrollment of the dental therapist. To avoid interruption in enrollment, the dental therapist must ensure his or her CHAMPS enrollment information reflects current supervising dentist information. (Refer to the Michigan Department of Health and Human Services [MDHHS] website at [www.michigan.gov/medicaidproviders](http://www.michigan.gov/medicaidproviders) >> CHAMPS >> Resources for additional provider enrollment information.)

Dental therapists who wish to provide services to Medicaid Health Plan (MHP) enrollees, Dental Health Plan (DHP) enrollees or Integrated Care Organization (ICO) enrollees are encouraged to contact the individual MHP, DHP or ICO for additional enrollment, credentialing, and contract requirements.

### **Billing and Reimbursement for Dental Therapists**

A dental therapist is required to have a Type 1 (Individual) NPI number to enroll. The dental therapist is considered a rendering/servicing-only provider. Rendering Provider is a Type 1 (Individual) NPI who renders services strictly on behalf of an organization, clinic or group practice. They are required to affiliate with a Type 2 (Group) NPI such as a Federally Qualified Health Center (FQHC), Local Health Department, clinic, sole dentist or dental group in CHAMPS. Direct payment for services is issued to the Type 2 entity only and not to the individual. A Type 2 (Group) NPI is the number required for organizations under one tax ID. Payment for dental therapist services is made to the entity to which the dental therapist provider is associated with.

MHPs, DHPs and ICOs are responsible for reimbursing contracted providers or subcontractors for their services according to the conditions stated in the subcontract established between the dental provider and the MHP, DHP or ICO. Noncontracted providers must comply with all applicable authorization requirements of the MHP, DHP, ICO and uniform billing requirements.

### **Dental Therapist Written Practice Agreement**

As part of the enrollment and enrollment revalidation processes, the dental therapist must attest to having a valid written practice agreement with a Medicaid-enrolled dentist. Determination of medical necessity and appropriateness of services is the responsibility of the practitioner and the dentist based on the terms of their written practice agreement. The supervising dentist does not have to be physically on the premises where the services are provided.

The written practice agreement is a written document that the dental therapist and dentist utilize to outline the performance of dental care services. The agreement shall not include an act, task, or function that the dental therapist is not qualified to perform by education, training, or experience and that is not within the scope of the license held by the dentist. The agreement must meet the requirements within PA 368 of 1978 and include the effective date of delegation and subsequent review dates. A written practice agreement is valid for three years. The dental therapist must maintain the written practice agreement at his or her primary place of practice and provide the agreement to MDHHS upon request.

The dental therapist must notify MDHHS if their written practice agreement is terminated. Termination or suspension of the agreement by the supervising dentist may lead to disenrollment of the dental therapist from the Medicaid program. (Refer to the [MDHHS Medicaid Provider Manual](#) for additional guidelines and information regarding coverage of services, program enrollment, billing and reimbursement.)