



Jefferson Center
for mental health

January 13, 2014

Kimberley Smith
Department of Health Care Policy and Financing
1570 Grant Street, Denver, CO, 80203

RE: Proposed Adult Dental Benefit Coverage Standard

Dear Ms. Smith,

Thank you for the opportunity to provide comments on the proposed Adult Dental Benefit Coverage Standard. Jefferson Center for Mental Health is the community mental health center serving Jefferson, Gilpin and Clear Creek Counties since 1958. We are widely considered a leader and early adopter in the field of integrated health care and wellness services.

Dental care is of significant importance to clients with serious mental illness. While utilization of psychotropic medications can be a critical component of treatment, some produce side effects of dry mouth and decreased saliva which in turn cause increased dental breakdown. Additionally, people with serious mental illness may lack adequate nutrition and be unfamiliar with appropriate dental hygiene. Patients with co-occurring substance abuse disorders are at increased risk. Whether through use of methamphetamines (which typically destroy teeth) or more frequently tobacco (smoke or chew) the health effects to teeth and mouth are significant and serious. Lastly, patients with serious mental illness often have very limited financial resources to afford dental care, and have limited access to routine and preventive services. In addition to the pain and discomfort that dental problems cause, the effects to self-esteem are equally devastating and may be a barrier to accessing necessary recovery supports or even employment.

With these concerns in mind, we offer the following input on the proposed benefit design.

- On Page 1 "eligible place of service"- community mental health centers are absent from this list. Community mental health centers serve as the health care home for many patients with serious mental illness and we do not think the rules should preclude us from doing so if we have the capacity to directly provide these services or contract with dentists and dental hygienists to come on site.
- The proposed benefits package does not cover oral hygiene education/ instruction. This needs to be a benefit, particularly for those who have long-neglected care. Oral hygiene education would help ensure problems are prevented or caught and addressed early on, before becoming more costly to the state and painful to the patient.
- There is nothing in the benefit related to nutrition education, despite ample evidence that good nutrition is essential to good oral health.
- Given the linkages between oral health and substance use, it may be helpful to incentivize the use of SBIRT among dental providers. It may also be worth encouraging SBIRT users to add a question or two about oral health.

Thank you. Please feel free to contact me at (303) 432-5170 or mindyk@jcmh.org if I may be of assistance.

Sincerely,

Mindy Klownen, MNM
Director, Office of Healthcare Transformation, Jefferson Center for Mental Health