



National Association of State Medicaid Directors

an affiliate of the American Public Human Services Association

June 24, 2009

Ms. Cindy Mann  
Director  
Center for Medicaid and State Operations  
Centers for Medicare & Medicaid Services  
7500 Security Blvd.  
Baltimore, MD 21244

Re: Emergency Clearance: *State Collection and Reporting of Dental Provider and Benefit Package Information*; 74 F.R.; OMB Control Number (CMS-10285)

Dear Ms Mann:

I am writing to you on behalf of the National Association of State Medicaid Directors (NASMD) to express our concern about the new information collection request titled: *State Collection and Reporting of Dental Provider and Benefit Package Information* as printed in the *Federal Register* on June 23, 2009.

Dental participation in Medicaid and CHIP programs is a long standing challenge across the states. States continue to adopt various programmatic strategies to increase the number of dental providers in Medicaid and CHIP programs; however, many dentists do not publicize that they accept Medicaid.

We understand that Section 501 of the Children's Health Insurance Program Reauthorization Act requires the HHS Secretary to work with States, pediatric dentists, and other dental providers to include a current and accurate list of dental providers within each state on the Insure Kids Now website. While we understand the noble intent of the provision, and agree that this is important and useful information, our concern is that requiring all dental providers that provide services under Medicaid and CHIP to be identified on the website could have the unintended consequence of decreasing access to dental care. We are concerned that current dental providers may discontinue participation and that the requirement may deter future providers from enrolling.

CMS should consider a rule that allows providers to voluntarily provide information for the Insure Kids Now website or an option to opt-out. CMS can encourage all Medicaid and CHIP dental providers to participate with the website, but requiring this of all

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providers could result in the decrease of Medicaid participating dental providers which is counterproductive to the states' efforts to increase dental coverage for children.

We are eager to continue working with you on this and other issues and appreciate your time and assistance with this request. Should you have any questions please contact me at 202-682-0100 x299.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ann Clemency Kohler".

Ann Clemency Kohler  
NASMD Director

Cc: Jackie Garner  
Michelle Shortt