



March 30, 2022

Senator Jeb Bradley, Chairman  
Senate Health and Human Services Committee  
Legislative Office Building, Room 101  
33 N. State Street  
Concord, NH 03301

Submitted via email to: [Jeb.Bradley@leg.state.nh.us](mailto:Jeb.Bradley@leg.state.nh.us); [James.Gray@leg.state.nh.us](mailto:James.Gray@leg.state.nh.us);  
[Tom.Sherman@leg.state.nh.us](mailto:Tom.Sherman@leg.state.nh.us); [Becky.Whitley@leg.state.nh.us](mailto:Becky.Whitley@leg.state.nh.us); [Kevin.Avard@leg.state.nh.us](mailto:Kevin.Avard@leg.state.nh.us);  
[cameron.lapine@leg.state.nh.us](mailto:cameron.lapine@leg.state.nh.us)

RE: HB 103: Establishing a dental benefit under the state Medicaid program

Dear Chairman Bradley and members of the Senate Health and Human Services Committee:

Thank you for the opportunity to submit testimony regarding HB 103. Bi-State Primary Care Association is grateful for the attention the sponsors are giving to ensuring access to dental care for adult Medicaid recipients. We respectfully request the committee recommend HB 103 ought to pass.

Bi-State Primary Care Association (Bi-State) is a 501(c)(3) nonprofit organization, representing 28 member organizations across New Hampshire and Vermont that provide comprehensive primary care services to over 300,000 patients at 146 locations. Our members include community health centers (CHCs), federally qualified health centers (FQHCs), rural health clinics (RHCs), area health education center programs, and Planned Parenthood of Northern New England. New Hampshire's community health centers provide integrated primary care, substance use disorder treatment, behavioral health, and oral health services to approximately 112,000 patients, including 1 in 4 of *all* Granite Staters enrolled in the Medicaid program.<sup>1</sup>

Community health center dental staff see patients who cannot afford preventive treatment or restorative care because they have other bills to pay, and as a result they often lose teeth due to infection. This has an erosive effect on not only their appearance and ability to obtain employment (especially for those working in public-facing jobs like customer service), but also on their mental health. When patients lose a tooth or teeth, this causes their other teeth to move and shift, and dental conditions to occur in their gums as well. Too much stress and wear on the teeth after a tooth extraction will eventually accelerate further tooth decay. HB 103 will have a

---

<sup>1</sup> Statewide data from Kaiser Family Foundation: <http://kff.org/other/state-indicator/total-population>, BPHC 2020 UDS Summary Reports, and Self-Reported data in Bi-State Primary Care Association member surveys.

life-changing impact for Medicaid-eligible adults by providing them with preventive and restorative dental care that will give them the chance of restoring their teeth, rather than limiting them to receiving a tooth extraction.

We support the adult dental Medicaid benefit for economic reasons as well. Having access to preventative and restorative care will improve patients' quality of life, employment, and financial mobility, and reduce unnecessary emergency visits that are exorbitantly costly to the health care system and drain the hospitals' critical staff time and resources. We also believe this benefit will help incentivize more dentists in New Hampshire to open their doors to Medicaid patients, thereby improving access and treatment capacity.

Though we support HB 103, Bi-State and our members are concerned about a few conditions of the benefit in HB 103 that we respectfully ask you to reconsider.

**1. HB 103 as passed in the House carves out adults in the Medicaid population.**

HB 103 states that prosthodontics will be covered for nursing home residents, adults with developmental disabilities or acquired brain disorders, and Medicaid recipients who receive medical and other services at home under the federal Choices for Independence program; but it does *not* include coverage for many critical adult populations, including working adults, who make up a significant portion of Medicaid beneficiaries. Those who will not receive denture coverage include new mothers, those who fall under the breast and cervical cancer eligibility category, traditional Medicaid patients, and Medicaid expansion patients.

We believe that providing prosthodontics to some adults and not others is discriminatory and violates the mission of community health centers, who will largely be caring for the patients impacted by this bill. CHCs are committed to eliminating health disparities by providing compassionate care that is accessible to all community members. The carveout would create unnecessary barriers for many of their patients and the dental staff working to ensure equitable access to high-quality care.

**2. The denture carveout conflicts with the bill's purpose of expanding adult Medicaid dental benefit to those 21 and older.**

[Lines 1-7](#) of HB 103 recognize that “untreated oral health conditions negatively affect a person’s overall health and that good oral health improves a person’s ability to obtain and keep employment,” and HB 103 thereby determines in [lines 11-12](#) that “it is in the best interest of the state of New Hampshire to extend dental benefits under the Medicaid managed care program to individuals 21 years of age and over.”

Carving out certain individuals 21 years of age and over within this Medicaid benefit contradicts the very essence of why this benefit was developed, which is to positively impact the overall health and employment prospects of adult Medicaid beneficiaries by caring for their oral health, thereby reducing the need for more costly care down the road.

**3. The Centers for Medicare and Medicaid Services (CMS) approval for state plan amendments must ensure equity for the amount, duration, and scope of the benefit. (42 U.S.C. 1396a(a))**

The Centers for Medicare and Medicaid Services (CMS) approval process for state plan amendments requires states demonstrate that coverage is equitable for the amount, duration, and scope of the benefit.<sup>2</sup> We are concerned that limiting the prosthodontic coverage to nursing home residents, adults with developmental disabilities or acquired brain disorders, and Medicaid recipients who receive medical and other services at home under the federal Choices for Independence program, violates this federal requirement.

HB 103 is the result of years of collaboration among the Department of Health and Human Services, legislators, public health dentists, insurance carriers, and Medicaid beneficiaries. Bi-State and our community health center members strongly support HB 103 and respectfully request the committee recommend it ought to pass.

Please do not hesitate to contact me if you have any questions or would like more information.

Sincerely,

Kristine E. Stoddard, Esq.  
Director of NH Public Policy  
Office: 603-228-2830, ext. 113  
Cell: 480-794-0523  
[kstoddard@bistatepca.org](mailto:kstoddard@bistatepca.org)

---

<sup>2</sup> 42 U.S.C. §1396a(a)(10)(B) (last accessed on March 30, 2022).