

-M.O.M.A.-

## Medicaid Orthodontists of Massachusetts Association

*Created to "Provide quality orthodontic systems and care that is consistent with the Medicaid Act for EPSDT-entitled children of Massachusetts."*

30 College Avenue  
Somerville, MA 02144

August 10, 2023

Executive Office of Health and Human Services  
MassHealth Dental Program

**RE: BENECARE as MassHealth Dental Subcontractor**

To Whom it May Concern,

I am writing at this time, because I understand that Benecare is vying for the MassHealth Dental Program third party administrator (TPA) position - potentially replacing DentaQuest (DQ).

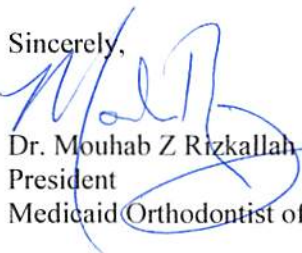
While DQ has done a good job at claims processing, DQ has been an irresponsible TPA in many other ways, including their harmful policy of utilizing out-of-state consultants to service the unique regulations (130 CMR 420 / 450) of the MassHealth dental program. These DQ consultants service numerous states - not just Massachusetts - and commonly misapply the standards of other states to the MassHealth program.

While these errors have been repeatedly presented to DQ as early as 2012, re-training and quality control continues to be poor by DQ's out-of-state consultants.<sup>1</sup>

In contrast, Benecare has a systematic history of using in-state consultants, which is at the core of their "relational service model" - forging effective relationships with members and providers. Furthermore, Benecare welcomes Peer Review, wanting to approve patients for their rightful Medicaid coverage.

For these stated (and other) reasons, as President of MOMA, and as a provider, I wholeheartedly endorse Benecare for the next TPA contract.

Sincerely,



Dr. Mouhab Z Rizkallah - DDS-MSD CAGS  
President  
Medicaid Orthodontist of Massachusetts Association

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<sup>1</sup> This was not a problem when MassHealth utilized in-state orthodontic consultants. As early as 2012, it was discovered that DQ was deceptively using dentists (not orthodontists) as consultants for orthodontic Prior Authorizations (though the TPA contract required orthodontists). MOMA exposed this, and other failures, and while DQ now utilizes orthodontists as consultants, these consultants are often confused and misapply other state regulations to MassHealth members. In fact, I have personally corrected over 400 improper DQ orthodontic denials via the Peer Review process - leading not to consultant correction by DQ, but remarkably leading to elimination of the Peer Review program entirely (DQ thereby hid its consultant errors - allowing DQ to be paid for poor TPA performance).