

GUIDANCE FOR DENTISTS & STAFF ON
REOPENING DENTAL OFFICES

DIRECTORY INFORMATION
VERIFICATION (DIV)



LIBERTY QUARTERLY

ORAL CANCER SCREENINGS:
MINORITIES & LOW-INCOME
INDIVIDUALS

PROVIDER COMPLIANCE
TRAINING



VOLUME 6, Q2 | SUMMER 2020

CORONAVIRUS COVID-19

Guidance for **Reopening** Dental Offices





Guidance for Dentists and Staff on Reopening Dental Offices During COVID-19 Pandemic

LIBERTY Dental Plan (LIBERTY) is deeply concerned about the well-being and health of our members and providers during the current coronavirus (COVID-19) epidemic.

Below are reliable website resources that offer safety, infection control standards, practice management guidelines and other topics to be considered when reopening your dental office. LIBERTY recommends that your office comply with local, federal and state regulations by visiting these websites regularly for updates.

- **Division of Consumer Affairs** (applicable by state)
- **American Dental Association (ADA)** COVID-19 Updates Resources, OSHA Guidance and Return to Work Interim Tool Kit https://success.ada.org/en/practice-management/patients/infectious-diseases-2019-novel-coronavirus?utm_source=adaorg&utm_medium=VanityURL
- **Center for Disease Control (CDC)** – Dental settings <https://www.cdc.gov/coronavirus/2019-ncov/hcp/dental-settings.html>
- **Occupational Safety and Health Administration (OSHA)** <https://www.osha.gov/SLTC/covid-19/dentistry.html>
- **The American Academy of Pediatric Dentistry (AAPD)** updates and information <https://www.aapd.org/about/about-aapd/news-room/infection-control/>

The AAPD also has a Re-emergence Pediatric Dentistry Practice Checklist available on their website for members.

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INTERNET ACCESS

www.libertydentalplan.com

- Verify Member Eligibility
- View Member Claims Submission
- Review Member Benefit Plans
- Submit Claims, Pre-Estimates and Referrals

PROFESSIONAL SERVICES

- Contracting
- Provider Education

TOLL FREE TELEPHONE:

California.....	800.268.9012
Florida.....	888.352.7924
Nevada.....	888.700.0643
New Jersey.....	833.276.0854
New York.....	833.276.0853
All other States.....	888.352.7924

TOLL FREE FAX:

California.....	800.268.0154
Florida.....	888.334.6034
Nevada.....	888.401.1129
All other States.....	888.401.1129



ACCREDITED
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CA Medicaid HMO and Marketplace HMO, NV & FL Medicare, Marketplace, Medicaid and Commercial HMO, EPO, PPO and POS.

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OUR MISSION

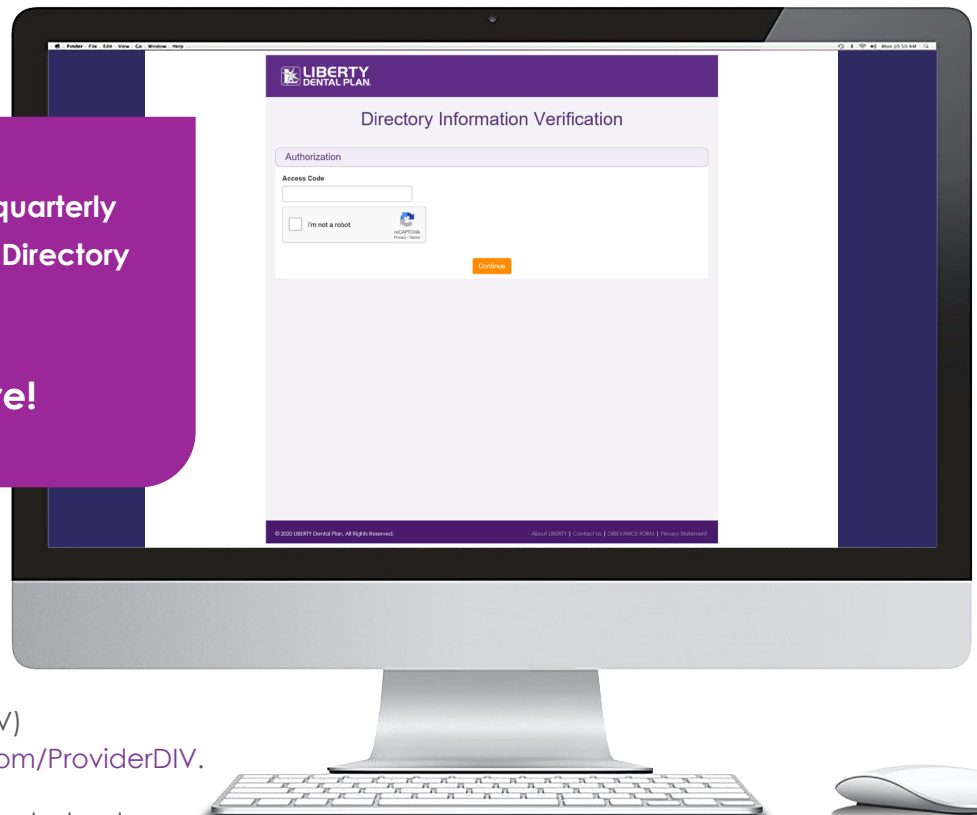
LIBERTY Dental Plan is committed to being the industry leader in providing quality, innovative, and affordable dental benefits with the utmost focus on member satisfaction.

Directory Information Verification (DIV): Keeping your Provider Profile Current

LIBERTY actively works to verify and maintain the accuracy of our provider directories which are available to members and the general public. It is required that we maintain current office information in order to ensure the information provided to our members reflects both your current office demographic information and associate dentist that are available to LIBERTY members.

Do you want to reduce your quarterly calls to update your Provider Directory Information (DIV)?

The solution is Here!



LIBERTY has launched a brand-new and easier way to update your information through our Provider Directory Information Verification (DIV) website at: www.libertydentalplan.com/ProviderDIV.

Anytime you have changes, including, but not limited to appointment times, office hours, address, phone number, fax number, associate dentist, etc., you'll be able to update or **attest** that no changes were made no less than **every 90 days** by going online. We also **highly recommend that** you set a calendar reminder in your system to go to the website every 90 days and validate the information.

You will need to have your office **Access Code** to use the online feature. All contracted network dental offices are issued a unique Access Code. This number can be found in your LIBERTY Welcome Letter. If you are unable to locate your Access Code, please contact our Professional Relations Department via email at PRInquires@libertydentalplan.com or call **888.352.7924** for assistance.

If you do not go online and confirm or modify your directory information every 90 days, you will receive a phone call or written Directory Information Verification Survey (DIV) form. It is important to review the information for accuracy and send back to LIBERTY within two weeks.

Oral Cancer Screening: Minorities and Low-Income Individuals



The American Dental Association recommends routine oral cancer screenings to help diagnose oral malignancies, as early detection and treatment significantly improve survival rates. Yet minority and low-income individuals are less likely to receive oral cancer screenings during dental visits. Each year, more than 30,000 new cases of cancer of the oral cavity and pharynx are diagnosed, and 8,000 deaths are due to oral cancer. Intra/Extra Oral Examinations are vital and should be conducted at every visit, as early detection is the key to increasing an individual's survival rate for these cancers.

LIBERTY's expectations are that all providers contracted within the network are conducting Oral Cancer Screenings on all members at every routine visit. These screenings should start being conducted as early as a child's first visit.

LIBERTY will be ensuring that these Oral Cancer Screenings are being conducted through our Quality Assurance Reviews. During these Quality Assurance Reviews our dental consultants will review member charts to assure that Oral Cancer Screenings are being conducted. The Quality Assurance Reviews will happen every 3 years or placed on a shortened scheduled if requested by the dental director. It is important that our providers understand that this element is critical and even one chart found deficient can call for a corrective action plan or a peer to peer call with LIBERTY's Dental Director.

Opioid Abuse in Dentistry

There is opioid crisis in the United States that is claiming thousands of lives every year. This crisis likely began with the over-prescription of opioids by medical professionals for post-surgery or pain management. The problem of substance abuse has emerged as a major issue in society and has become an area of major focus for healthcare professionals.

The profession of dentistry is not immune to this epidemic. Studies show that dentists are the second-highest prescribers of immediate-release opioids in the United States. However, in recent years, with proper education and protocols, and in response to the growing evidence of harm associated with over-use of opioids, dental providers have appropriately decreased their use of opioids, and have increased the use of non-opioid pain treatment options.

The new policies adopted by American Dental Association that mandate continuing education in prescribing opioids, controlling statutory limits on opioid dosage and duration, and registering with and utilizing Prescription Drug Monitoring Programs (PDMPs) to promote the appropriate use of opioids and deter misuse and abuse, have all been steps in the right direction in eradicating this ill-fated pandemic. We are dedicated to help fight this battle.

The Importance of Dental Chart Documentation:

Education Material to Support Our Network Dental Offices

The dental chart is a legal document. It is the first line of defense in a malpractice suit. When a patient decides to file a lawsuit against a dentist, the dental chart becomes the single most important piece of information relative to the suit. A poorly written, inadequate narrative can be the most damaging evidence against a clinician.

The patient chart must likewise include a notation of any significant dental history, e.g. an assessment of caries risk and periodontal health. Every patient is unique, and the dental history should be considered together with the clinical examination when planning and sequencing of dental care.

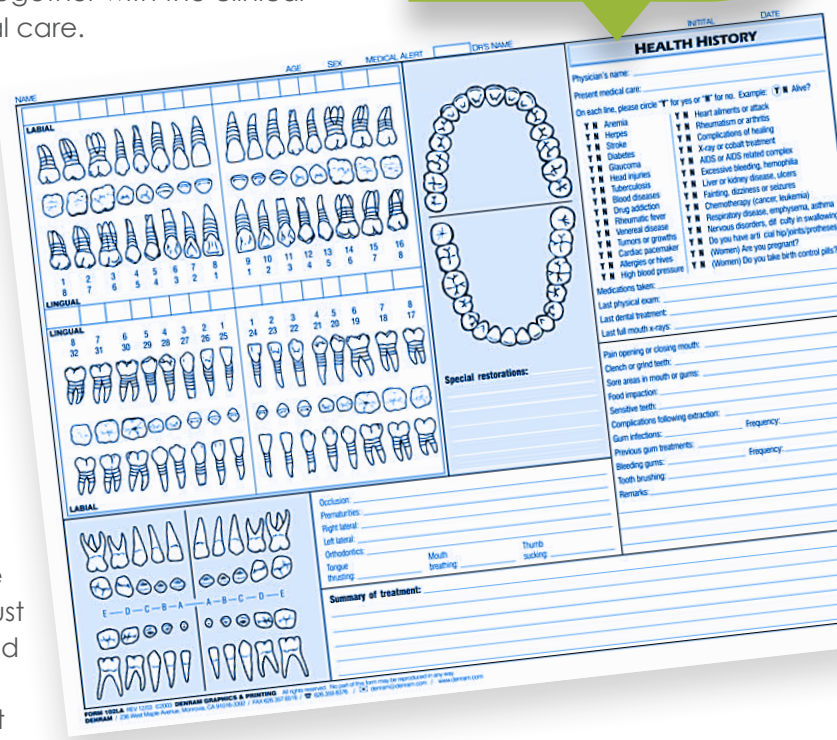
Whether the entry into the dental record is handwritten or electronic, it must be complete and consistent with all other patient record entries.

If handwritten, the information must be complete, legible, and entered in non-erasable ink. As this is a legal document, treatment procedures and the names of dental materials must be spelled correctly. If the entry is electronic, the software has a program that tracks all entries by identifying the person who accessed the record.

In both cases, entries must be accurate and factual. Even as the patient is describing the reason for their visit, descriptions, or symptoms, the statements must be documented as said without inference. Statements must be truthful and objective (as opposed to subjective and inferring opinion) except for those related by the treating dentist regarding possible diagnosis, treatment plan, and prognosis. Signs are what is seen (ex. abscess, swelling, widened periodontal ligament space in a radiograph) and collected while observing the patient. Facts include date of treatment, updated medical issues, and the tooth/teeth with their involved surfaces under treatment.

Anytime that anesthetic is administered during treatment, the name, epinephrine ratio, and number of cartridges must be noted. An additional notation on how the patient tolerated the anesthetic and procedure overall is good follow up. If a certain anesthetic is chosen specifically due to a medical condition, that is also noted. More dental offices are performing soft tissue exams and vital sign readings at appointments. These should be included and documented offering history of findings. As periodontal screenings are performed, these findings must be included in the record. As a periodontal condition is often the reason for litigation, the office must work to protect itself and discuss these matters with the patient and record any treatment plans and patient referrals.

A poorly written, inadequate narrative can be the most damaging evidence against a clinician.



Free Interpretation Services

Did you know that LIBERTY offers free interpretation services at your dental office to appropriately communicate with LIBERTY members?

LIBERTY offers interpretation services, both “telephonic” and “onsite,” to all network providers who provides dental services to LIBERTY members for the following lines of businesses: Commercial, Medicaid, Medicare, and Marketplace for all states.

Please call LIBERTY's Member Service Department to schedule an onsite interpreter, at least one week in advance prior to the member's appointment, to ensure an interpreter is available.

Due to the limited availability for American Sign Language interpreters, LIBERTY recommends providers and staff to schedule, as soon as you schedule the appointment for the member or at least two weeks prior to the appointment, to ensure an interpreter is available.

Below are some tips when working with American Sign Language Interpreters:

Working with American Sign Language Interpreters

- Be sure that there is proper lighting as the interpreter needs to be visible to the patient for effective communication.
- Maintain eye contact and speak directly to the patient. Since the patient will be looking at the interpreter while you are speaking, it is useful if the interpreter sits or stands close to you.
- In order to have a more accurate interpretation, allow enough time for the interpreter to convey the full message. Wait for a response before talking again.
- Clarify any unique vocabulary such as acronyms and technical terms. It is recommended to use short, simple sentences.
- Avoid asking the interpreter for opinions or comments about the content of the meeting or information about the patient. Interpreters follow a code of ethics that requires impartiality and confidentiality with all assignment related information. Do not assume that the interpreter has prior knowledge of the patient or will be interpreting future appointments.
- Be aware that sign language interpreting is physically and cognitively demanding. Assignments of an hour or more in length that are technical or non-stop may require occasional breaks.

Reminder: Annual Compliance Training

Please remember to complete your annual compliance training attestation at the following link:

<https://www.libertydentalplan.com/Resources/Documents/Provider%20Compliance%20Attestation.pdf>

Utilize LIBERTY's training modules (or your own comparable content). Please follow the steps listed below to access LIBERTY's training modules:

- Go to www.libertydentalplan.com
- Click on Providers at the top of the page
- Click on these training module links:
 - Critical Incident Training
 - Code of Business Ethics & Conduct
 - Culturally & Linguistically Appropriate Service Standards
 - Fraud Waste & Abuse Training
 - Medicare Part C D General Compliance
 - Language Assistance
 - ACA Section 1557
 - HIPAA

Signed attestations may be returned via any of these methods:

- Fax to: **949.313.0766**
- Email to: PRInquiries@libertydentalplan.com
- Upload the attestation to our website: <https://www.libertydentalplan.com/Providers/Provider-Training-Acknowledgement.aspx>
- Mail to: LIBERTY Dental Plan, Attention: Professional Relations, P.O. Box 26110, Santa Ana, CA 92799-6110

Additional resources and educational trainings are available, at no cost, on our website. We encourage you to visit the website to access these additional resources.



Safeguarding PHI Important Reminders

As a dental provider, your office is fully aware that the Health Insurance Portability Accountability Act (HIPAA) requires the protection and confidential handling of patient Protected Health Information (PHI). HIPAA requires health care providers to develop and implement safeguards that ensure the confidentiality and security of all forms of PHI (whether electronic, verbal, or tangible) when transmitted or stored. Failure to properly safeguard PHI can result in breaches, enforcement actions and significant monetary penalties and, as it concerns LIBERTY members, is a violation of LIBERTY's provider agreement.

Please take this opportunity to review your office's privacy and security practices to ensure they comply with HIPAA requirements, and take note of the below reminders regarding safeguarding LIBERTY Member PHI. If we discover you have transmitted LIBERTY member PHI via a potentially non-secure method, or if we are otherwise notified that you may not be properly safeguarding such PHI, we will contact you to investigate the matter. Non-compliance will

result in a Corrective Action Plan and continued or egregious non-compliance will result in contract termination.

► **Electronic PHI** - ensure referrals, authorization requests, medical records and other e-PHI are transmitted in a HIPAA compliant manner using secure fax, secure FTP, encrypted email (which requires recipient authentication to access email content), or LIBERTY's secure web portal.* Note the following:

- Use of PHI (including member name, ID, or other identifying information) in the subject lines of emails or to name e-files is **not** permitted.
- Use of free email service providers, like Gmail, Hotmail, or Yahoo, is **not** a permitted method for transmitting LIBERTY Member PHI*.
- Transmission of PHI via text is **not** permitted*.
- LIBERTY providers may transmit e-PHI to LIBERTY using LIBERTY's HIPAA compliant, secure web portal by following these simple steps:



- Go to www.libertydentalplan.com
- Go to **Provider menu** at top of the page
- **Select Secure Email Portal**

- Use physical and technical safeguards to ensure that monitors cannot be viewed by unauthorized individuals, and that screens automatically lock on devices, after a reasonable period of inactivity.
- Maintain protocols to ensure faxes containing PHI are issued to the correct recipient, and that increased precautions are applied when faxing especially sensitive information (such as sensitive diagnoses).

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Safeguarding PHI - Important Reminders

**When transmitting a member's own PHI to the member, the member's written request to receive the PHI electronically through a method other than those listed above may be honored, provided that reasonable steps have been taken to validate the member's identity, and the potentially unsecure nature of the transmission has been disclosed to the member in writing in advance of the transmission.*

- ▶ **Verbal PHI** – do not discuss patients in public areas (including waiting rooms, hallways and other common areas), even if you believe you are masking the patient's identity. Ensure conversations within examination rooms or operatories cannot be overheard by those outside of the room. Use heightened discretion when discussing sensitive diagnoses or other sensitive matters, including when such discussions occur with the patient in an exam room or operator. Best practices include:
- Implementing appropriate physical safeguards such as closed doors and insulated walls for exam rooms and operatories.
 - Implementing ambient music or white noise to cover conversations in common areas.
 - Arranging waiting areas to minimize one patient overhearing conversations with another.
 - Posting a sign requesting that patients who are waiting to sign-in or be seen, do not congregate in reception area.
 - Ensuring unauthorized persons cannot overhear phone calls and limiting what is communicated by phone and voicemail to the minimum necessary information to accomplish the required purpose. Avoid use of speaker phones.

- ▶ **Tangible PHI** – do not display or store paper or other tangible PHI in common areas. Do not leave such PHI unattended on desks or in exam rooms or operatories. Never dispose of paper or other tangible PHI in the trash. Use secure methods to destroy and dispose of such PHI (for example, cross-cut shredder).

- All PHI must be locked away during close of business (for example, in a locked cabinet).
- Window blinds must be closed to prevent outside disclosure.
- Mailing envelopes must not be overstuffed and mailing addresses must be printed accurately and clearly to minimize the possibility that mail is lost in transit.
- When transporting tangible PHI take precautions to ensure it is not lost in transit, and do not leave tangible PHI in vehicles unattended.

