

Rule Impact Statement (2025)

A. Purpose of the proposed rule and legal authority (75 OS 253(B)(2)(b)(1), 75 OS 303(D)(2)(a))

The purpose of the proposed rule changes is to align dental imaging policy with the current standard of practice and ensure appropriate utilization of dental extraction services.

The legal authority for this proposed rule is 63 O.S. §5007(C)(2).

B. Brief description of the proposed rule (75 OS 253(B)(2)(b)(3))

The proposed policy changes update dental imaging requirements to reflect the current standard of care and ensure appropriate billing for complex extractions. Current OHCA policy defines a “full mouth series” as two bitewings and panoramic images. The revision clarifies that a compensable full mouth series consists of at least 10 periapical images and at least 2 posterior bitewings, consistent with current dental practice. The changes also establish a prior authorization requirement for complex extractions (CDT codes D7210 and D7250) due to program integrity concerns. There are no changes to policy or billing expectations for simple extractions (CDT code D7140).

C. Classification of proposed rule (75 OS 253(B)(2)(b)(2))

Classification: Nonmajor

Justification: The proposed changes are expected to be budget neutral or create savings for OHCA.

Total annual implementation and compliance costs: Budget neutral.

Methodology used to calculate costs (75 OS 253(B)(2)(b)(7)): The proposed changes do not create any new coverage or reimbursement; they make administrative changes to existing services. Because the proposed changes are intended to ensure appropriate utilization of higher-cost dental services, OHCA may see some savings.

D. Description of affected classes of persons most likely to be impacted by the proposed rule (75 OS 253(B)(2)(b)(4), 75 OS 303(D)(2)(b))

Dentists are most likely to be impacted by this proposed rule. SoonerCare members may be indirectly impacted by this proposed rule.

E. Description of classes who will benefit from the proposed rule (75 OS 253(B)(2)(b)(5), 75 OS 303(D)(2)(c))

SoonerCare members and Oklahoma taxpayers will benefit from guardrails to ensure appropriate utilization of higher-cost dental services. Dentists will benefit from updated policy that accurately reflects their practice and standard of care.

F. Comprehensive economic impact analysis (75 OS 253(B)(2)(b)(6), 75 OS 303(D)(2)(d)): The proposed changes are expected to be budget neutral because they do not create any new coverage or reimbursement.

G. Methodology used to calculated costs (75 OS 253(B)(2)(b)(7)): There are no anticipated costs associated with the proposed changes; they do not make any changes to coverage or reimbursement of dental services. Dental imaging and complex extractions are already covered services in the Oklahoma Medicaid program and will continue to be covered when medically necessary. There is no change to reimbursement of those services. Because the proposed changes are intended to ensure appropriate utilization of higher-cost dental services, OHCA may see some savings.

H. Probable costs and benefits to OHCA and other agencies (75 OS 253(B)(2)(b)(6), 75 OS 303(D)(2)(e))

The are no anticipated costs to OHCA associated with this proposed rule. The staff time necessary to review prior authorization requests for complex extractions will be absorbed by existing agency capacity. OHCA will benefit from guardrails that ensure appropriate utilization of higher-cost dental services.

There are no anticipated impacts of the proposed rules on other agencies.

I. Economic impact on political subdivisions and whether their cooperation is required (75 OS 253(B)(2)(b)(8), 75 OS 303(D)(2)(f))

There is no anticipated economic impact on any political subdivisions, and their cooperation is not required.

J. Economic impact on small businesses (75 OS 253(B)(2)(b)(9), 75 OS 303 (D)(2)(g))

There is no anticipated economic impact on small businesses.

K. Measures taken to minimize compliance costs and assessment of less costly, less intrusive, or nonregulatory alternatives (75 OS 253(B)(2)(b)(10), 75 OS 303(D)(2)(h))

OHCA has already pursued nonregulatory alternatives to the proposed changes; they have not been successful. The proposed changes are necessary because OHCA has observed inappropriate utilization of complex extraction services (CDT codes D7210 and D7250). OHCA has communicated appropriate billing expectations and medical necessity criteria for these services to providers through a global message (sent August 23, 2024). The American Dental Association has established guidelines for these services. OHCA continues to see inappropriate utilization. Prior authorization is the next step in utilization management, but OHCA requires a policy change to implement a prior authorization for dental services.

OHCA dental policy includes minimum imaging standards. The proposed changes are necessary to ensure imaging policy is aligned with current practice and dental standards of care. OHCA worked with faculty at the University of Oklahoma College of Dentistry to ensure the proposed language reflects current practice and education standards.

L. Effect of the rule on public health, safety, and the environment (75 OS 253(B)(2)(b)(11), 75 OS 303(D)(2)(i))

The proposed rule changes are anticipated to have a positive effect on public health by ensuring appropriate utilization of dental services and aligning OHCA dental policy with current practice.

M. Detrimental effects if the proposed rule is not implemented (75 OS 253(B)(2)(b)(12), 75 OS 303(D)(2)(j))

The purpose of the proposed rules is to address dental program integrity concerns. If the proposed rules are not implemented, OHCA will continue to have limited ability to proactively to address those concerns and ensure appropriate utilization of dental services.

N. Summary of and preliminary comparison to existing or proposed federal regulations (75 OS 303(D)(2)(n))

The proposed changes are aligned with federal Medicaid regulations on dental services (42 CFR 440.100). OHCA is not aware of any proposed federal regulations related to dental services.

O. Analysis of alternatives to adopting the proposed rule (75 OS 303(D)(2)(l))

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P. Estimates of internal OHCA employee time and other resources used to develop the proposed rule (75 OS 303(D)(2)(m))

Policy staff time: 20 hours

Dental staff time: 20 hours

SoonerSelect staff time: 20 hours

Q. Date statement prepared or modified (75 OS 253(B)(2)(b)(13), 75 OS 303(D)(2)(k))

Prepared: November 25, 2025

Modified: December 5, 2025; December 8, 2025