



Virginia Dental
ASSOCIATION

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September 10, 2026

The Honorable Abigail Spanberger
Governor of Virginia
Patrick Henry Building
1111 East Broad Street
Richmond, VA 23219

Re: Implementation of Dental Medicaid Cap, Impact on Vulnerable Virginians

Dear Governor Spanberger:

On behalf of the Virginia Dental Association, representing over 3,600 member dentists, I am writing to ask you to wait for federal approval of Virginia's waiver before putting in place a timeline for an annual cap on dental Medicaid reimbursements.

We wrote in May about the impact a \$2,000 annual dental Medicaid cap will have in creating new barriers to care for vulnerable Virginians and putting the adequacy of the Medicaid provider network at risk.

The annual cap was proposed by Governor Glenn Youngkin in his outgoing budget without consulting dental providers:

*The Department of Medical Assistance Services shall seek federal authority to amend the state plans under Titles XIX and XXI of the Social Security Act and any applicable waivers to impose a \$2,000 annual spending limit per recipient on adult dental services. The department shall promulgate emergency regulations to implement this change within 280 days or less from the enactment of this act. **The department shall implement this change upon federal approval and prior to the completion of any regulatory process undertaken in order to effect such change.***

As Virginia has not yet sought a waiver from CMS, and the legislation directs DMAS to implement the change upon federal approval, we ask that your administration not take action to put in place a timeline for implementation until such federal approval has been granted.

Should CMS return with questions or request modifications to Virginia's waiver application, this sequence will allow DMAS and its contracted dental benefit administrator, DentaQuest an opportunity to fully communicate the anticipated changes and allow dental practices time to plan for the change with as little impact on patient care as possible.

Virginia has made significant progress in increasing access to essential dental care for Medicaid recipients in the last five years, with more than 700 new participating dentists added to the Medicaid network and 200,000 adults accessing dental care each year through their benefit. Putting in place a rushed process to cap benefits without fully communicating the impact to providers would put the reputation and effectiveness of DMAS and the Medicaid program at risk.

Even if implemented smoothly, we expect capping dental benefits to shift expenditures from preventive, cost-effective care to crisis-driven, high-cost interventions. It will burden hospitals, strain the Medicaid system, and create additional administrative burdens on providers who are already stretched thin in alleviating patient wait lists – particularly in rural areas and safety net settings.

Medicaid members with special needs requiring additional accommodations will be disproportionately impacted by this cap, should it be implemented without exceptions. Virginia currently ranks last among states¹ in access to regular dental

care by individuals with developmental disabilities and is 30 percent below the ADA/Olmstead compliance benchmark set in Virginia's DOJ settlement².

We would welcome a meeting at your convenience to further discuss this matter and appreciate your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "Marlon Goad", with a stylized, cursive script.

Dr. Marlon Goad

President

Cc: Rebecca Eichmann, Policy Director; Gerica Goodman, Legislative Director; Davis Gammon, Deputy Legislative Director; Marvin Figueroa, Secretary of Health & Human Resources; Mark Sickles, Secretary of Finance; Steve Ford, DMAS Director; Senator Barbara Favola; Senator Louise Lucas; Senator Todd Pillion; Delegate Luke Torian; Delegate Rodney Willett