
DATE: September 15, 2009

REPORT TITLE: **UPDATE ON THE REGION OF PEEL'S SENIORS' LOW-INCOME DENTAL PROGRAM**

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OBJECTIVE

This report provides the information sought by Regional Council in the staff directions from Council Report HE-C3 on the Region of Peel's Low-Income Seniors' Dental Program.

REPORT HIGHLIGHTS

- On May 28, 2009 Peel Public Health requested direction from Regional Council regarding management of the Seniors' Dental Program.
- Regional Council requested that several issues be researched in order to provide direction to Peel Public Health.
- A review of many programs revealed a range of eligibility screening methods utilized including declaration, income and needs testing. Signed declaration or proof of Guaranteed Income Supplement are the recommended options.
- To decrease the waiting list of 3,000 clients, Council as part of the 2010 budget process could direct staff to transfer a further \$1.2 million additional funds from Reserves to increase the funding to \$2.4 million in 2010. These funds would reduce the wait list by approximately 1,000 seniors.

DISCUSSION

1. Background

In the May 28, 2009 Council Report HE-C3, Peel Public Health requested direction from Regional Council regarding the future of the Seniors' Dental Program in 2009 and beyond. Regional Council requested that several issues be researched in order to provide direction to Peel Public Health.

Specifically, Regional Council requested:

- a) The investigation of the City of Toronto Dental Program eligibility criteria;
- b) The feasibility of implementing a card tracking system to record the allocation of program funds among dental service providers;
- c) The investigation of eligibility criteria of other Human Services programs, including "income testing" and "needs testing" to determine whether the same processes could be utilized for the Seniors' Dental Program;

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- d) Follow-up with the Ministry of Health and Long-Term Care with respect to the timing and allocation of provincial funding for low-income dental programs;
- e) Details regarding the rising average costs of Seniors' Dental Program participants; and,
- f) The availability of Regional funds for the Seniors' Dental program.

2. Findings

The following findings address Council's staff directions:

a) The City of Toronto Program Eligibility Criteria

The Toronto Dental Program's financial eligibility criteria are based on Low-Income Cut-off (LICO) amounts determined by Statistics Canada plus 20 per cent. Clients must provide documentation to verify their identification, address and financial hardship. As well, clients must have a dental condition requiring treatment, and must not have any dental insurance. Seniors must be 65 years of age and older. The City of Toronto Dental Program verification processes are carried out in person at one of their 14 City operated clinic sites.

b) Feasibility of Implementing a Card Tracking System

Several programs were investigated for use of a card tracking system for programs that target low-income clients. The Mississauga Active Assist Program is designed similarly to a card tracking system, although there is no actual card. Eligible clients have a \$275 credit to use towards recreation programs. A central database debits from this credit when a service is purchased. The credit is valid for one year and has no cash value.

The Brampton Snow Removal Financial Assistance Program, Mississauga Snow Removal Subsidy Program, Hamilton Seniors' Dental Program, Halton Seniors' Dental Program, Region of Peel Ontario Works, Region of Peel Long-Term Care, Region of Peel Children's Services, and Region of Peel Housing do not use card tracking systems because they would need to create a database and system to credit the service among multiple providers. The Seniors' Dental program would encounter the same challenges of creating agreements and a crediting system with Dentists, Hygienists and Denturists, so this approach is not recommended.

c) Eligibility Criteria of Other Human Services Programs

Several programs were investigated regarding the financial eligibility criteria for their programs. Some programs used income or needs testing, while other programs did not use any testing.

Income Testing

The Hamilton Seniors' Dental Program, Mississauga Active Assist Program, Mississauga Snow Removal Subsidy, Region of Peel Long-Term Care Program, Region of Peel Children's Services, and the Region of Peel Housing program each utilize income testing financial eligibility criteria for their programs targeting low-income individuals. Specifically, clients must provide proof of income through documentation such as a Notice of Tax Assessment. The following lists the specific financial eligibility criteria:

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- Financial eligibility criteria for the Hamilton Seniors' Dental Program and Mississauga Active Assist Program are based on LICO.
- The Mississauga Snow Removal Subsidy Program's financial eligibility is based on the recipient showing proof that they are either receiving a monthly Guaranteed Income Supplement under Part II of the Old Age Security Act (Canada) or being handicapped or physically disabled in such a way as to restrict his/her mobility and in receipt of benefits under the Ontario Disabilities Support Program or in receipt of assistance under the Ontario Works Support Act.
- The Region of Peel Long-Term Care program assists low-income clients to apply for a subsidy which is based on the Ministry of Health and Long-Term Care's specified low-income financial cut-off value.
- The Region of Peel Children's Services Child Care Subsidy program is based on family income using a sliding scale with no financial cut-off value.
- The Region of Peel Housing program's Rent-Geared-to-Income assistance is based on 30 per cent of gross household income.

Needs Testing

- Eligibility for the Region of Peel Ontario Works program is based on needs testing. This is a more comprehensive process for determining eligibility which involves assessing various factors including an individual's income, assets, family size, accommodation, expenses, etc. Of all the options reviewed, this more detailed assessment would require the most additional staff because it is the most labour intensive approach. In addition, consultation with Human Services staff indicated that while it may be possible for seniors' dental income testing to be done in the common intake service they are developing, it would require additional staff to perform the assessment.

No Needs or Income Testing

- The Halton Seniors' Dental Program does not utilize income or needs testing, and eligibility is based on client's declaration of a financial hardship to pay for dental services.
- The Brampton Snow Removal Financial Assistance Program does not utilize income or needs testing. To be eligible for this program, clients must own their home and must be 65 years and older or have a disability that impedes their ability to remove snow on their property. There are no financial eligibility criteria for this program.

Previously, reviews have been conducted on the advantages and disadvantages of various financial eligibility testing options. These reports balance the staff resources required to administer the financial assessment against the potential of ineligible clients accessing the program. Ineligible clients have tended to be low-income, but not in sufficient financial hardship to meet the program's criteria. As well, most ineligible clients have met the criteria, but were unable to provide the proof immediately because, for example, they had to apply for a copy of their Guaranteed Income Support or tax assessment or because they have not filed an income tax return.

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A 1999 report on Peel Public Health's Dental program for Low-Income Children (Children in Need of Treatment - CINOT) indicated that means testing was not necessary for the children's program, citing administrative costs outweighing the very small numbers of ineligible clients identified. A 2003 Ministry of Health and Long-Term Care report entitled Report of the Stakeholder Working Group on Financial Eligibility for the CINOT Dental Program came to the same conclusion, noting the decrease in funds available for dental treatment if a means testing model was pursued. A 2009 random sample review of the Seniors' Low-Income Dental program revealed that only two clients (out of 27) were ineligible for the program. One was a recipient of the Ontario Disabilities Program, while the other had an annual income greater than the LICO cut-off plus 20 per cent or approximately \$25,000.

d) Timing and Allocation of Provincial Funding

Senior staff at the Ministry of Health Promotion have been regularly contacted regarding the release of the remaining portion of the \$135 million in funding for better dental care for low-income families. Aside from the funding allocated to the expansion of the Children in Need of Treatment (CINOT) program January 1, 2009; further information regarding the remaining provincial funding for low-income dental programs has not yet been made available. Peel Public Health has not received information on how much funding will be allocated to each health unit, what type of programming we will be directed to complete with the funding, or when we will receive the funding.

To date, Health staff have worked in collaboration with the Ontario Association of Public Health Dentistry, Peel Poverty Action Group and the Toronto Oral Health Coalition to push for the release of the remaining funds. Similarly at the recent AMO Annual Conference, members of Council and senior staff met with Ministry of Health and Long-Term Care senior staff and urged the Provincial Government to expedite release of the funding and allow municipalities to have jurisdiction over the allocation of those funds for any segment of the low-income population within their boundaries.

e) Average Costs of Seniors' Dental Program Participants

As directed by Regional Council, Peel Public Health staff consulted with the Ontario Dental Association and Halton-Peel Dental Association and, as a result, dentists were the first oral health care providers to have an agreement with the Region to provide the program. Subsequently the Denturist Association of Ontario and the Ontario Dental Hygienists Association finalized agreements for use of their specific lists of eligible codes and descriptors. Therefore, when the program began there were no denture claims. As the program has progressed, there has been an increasing number of denture claims which are typically higher cost than dental work claims. With time, this has increased the average cost of claims from \$900 to \$1300. Further, more than one claim has been submitted for clients as dental providers choose how often they bill for their services. Early in the program the average cost per client was lower as dentists had not submitted all claims for each client and claims did not include dentures.

f) Availability of Regional Funds to Boost the Seniors' Dental Program

Staff were directed to include information regarding the availability of Regional funds to boost the Seniors' Dental Program. Demand for the program has slowed from 75 to 55 new clients per week. The wait list was up to 4,000 clients but has been reduced to 3,000 clients. Addressing the current wait list can be addressed through an allocation of working fund reserves. Ongoing monitoring of demand for the service is required to

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determine the longer term base funding requirements for the Seniors' Dental Health Program. One-time reserve funding of \$1.2 million in 2010 will considerably decrease the wait list and provide dental care to many more low-income seniors, approximately 1,000 depending on the treatment required.

3. Proposed Direction

After having reviewed the information gathered and considered the implications for efficient program delivery, Peel Public Health proposes the following options:

Option 1

Maintain the current eligibility approach of legal declaration because the low cost of administration and because both audits indicated almost all clients are very low-income.

This approach ensures that seniors who need dental care and declare financial hardship do not wait to receive treatment.

Option 2

Similar to the City of Mississauga Snow Removal Subsidy Program, use the federal screening developed for the Guaranteed Income Supplement.

The advantage of this approach is that administration for the most part is already completed by the federal government staff when they screen for financial eligibility for their program. Peel Public Health would require proof of receipt of the Guaranteed Income Supplement which would minimize the need for additional staff resources. However, this approach limits access to those who submit an annual income tax return, and can produce proof of a Guaranteed Income Supplement. Seniors who need immediate service, but need to file income tax or apply for a copy of their Guaranteed Income Supplement, would not be able to get immediate dental treatment.

Depending on the effect of the eligibility adjustment, other administrative options such as a maximum upper limit for treatment may be employed to manage the overall program.

FINANCIAL IMPLICATIONS

Council has approved the annualized budget of \$1.2 million plus \$500,000 carried forward from unspent 2008 budget for the Seniors' Dental Program in 2009. Council directed staff to report on ways to boost the funding of the program. Council, as part of 2010 Budget process could direct staff to transfer a further \$1.2 million from Reserves for a total budget of \$2.4 million in 2010. The additional funds would be used to decrease the wait list from 3,000 to 2,000 seniors; to pay dentists; and for two contract staff to check eligibility and process the additional dental claims.

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CONCLUSION

Considerable positive feedback has been received regarding the Seniors' Low-Income Dental program including unsolicited testimonials from seniors. To manage the demands on the program, Peel Public Health requests direction on further funding and adjustments to the eligibility for the service.



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