

**Managed Care Operations Memorandum**  
**General Operations**  
**MCOPS Memo #04/2025-003**

**Date:** April 8th, 2025

**Subject:** Application of Topical Fluoride Varnish

**To:** All Physical Health (PH) HealthChoices Managed Care Organizations (MCOs)

**From:** Gwendolyn Zander, Director, Bureau of Managed Care Operations, Office of Medical Assistance Program, Department of Human Services

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**A. PURPOSE**

The purpose of this Operations Memo is to ensure that HealthChoices PH-MCOs are aware of, educate network providers regarding, and align policies with, [Medical Assistance \(MA\) Bulletin 09-25-35 "Application of Topical Fluoride Varnish."](#)

In addition, PH-MCOs are also reminded of the terms of HealthChoices PH Agreement Exhibit A, "Managed Care Regulatory Compliance Guidelines," by which PH-MCOs are exempted from the provisions of 55 Pa Code § 1141.53 (a) through (c), "Payment conditions for outpatient services" and § 1141.54 (f) and (g), "Payment conditions for inpatient services"

**B. BACKGROUND**

The American Academy of Pediatrics (AAP) and the American Academy of Pediatric Dentistry (AAPD) recommend that children up to the age of 21 receive Topical Fluoride Varnish (TFV) treatments ([http://www.aapd.org/media/Policies\\_Guidelines/G\\_Periodicity.pdf](http://www.aapd.org/media/Policies_Guidelines/G_Periodicity.pdf)).

The Department of Human Services (Department) began payment to physicians and certified registered nurse practitioners (CRNPs) for the application of TFV to MA beneficiaries under five years of age on April 1, 2010, as advised in [MA Bulletin 09-10-08](#). This bulletin also described mandatory training that practitioners had to complete in order to be paid for applying TFV to MA beneficiaries.

**C. DISCUSSION:**

With the issuance of [MA Bulletin 09-25-35](#), the Department advised MA-enrolled physicians, physician assistants (PAs), and CRNPs that they can render TFV services to MA beneficiaries, reminded providers of updated limits for procedure code 99188 on the MA Program Fee Schedule for the provision of TFV, and removed mandatory TFV training requirements.

Under the terms of HealthChoices Physical Health Agreement Exhibit A, Managed Care Regulatory Compliance Guidelines," PH-MCOs are **not** required to adhere to the provisions of 55 Pa Code § 1141.53 (a) through (c), "Payment conditions for outpatient services" and § 1141.54 (f) and (g), "Payment conditions for inpatient services" which state that all covered outpatient and inpatient physicians' services billed to the Department shall be performed by such physician either personally or by a registered nurse, physician's assistant, or a midwife under the physician's direct supervision."

For PH-MCOs, PAs may bill under the supervising physician. CRNPs may bill independently or via a supervising physician. Physicians may bill for TFV that is applied by licensed and non-licensed clinical personnel (such as medical assistants) clinically trained to perform application of TFV, under their guidance. As advised in MA Bulletin 09-25-35, MCOs need no longer require the TFV training in order to bill for the services: Physicians are responsible for assuring their clinical staff are properly trained to apply TFV.

#### **D. NEXT STEPS**

PH-MCOs should remind providers of the importance of TFV services and that MA- enrolled physicians, PAs, and CRNPs can render TFV services to MA beneficiaries, remind providers of updated limits for the provision of TFV on the MA Program Fee Schedule, and remind providers of the removal of mandatory TFV training requirements.

#### **E. ATTACHMENTS/RESOURCES:**

[MA Bulletin 09-25-35](#)

PROMISe™ Provider Handbook and Billing Guides:

<https://www.pa.gov/agencies/dhs/resources/for-providers/promise/promise-provider-handbooks-guides.html>.

MA Program Outpatient Fee Schedule:

<https://www.humanservices.state.pa.us/outpatientfeeschedule>.

The Department's "Dental Care Provider Information" webpage –

<https://www.pa.gov/agencies/dhs/resources/for-providers/ma-for-providers/dental-care-provider-information.html>