

May 14, 2015

Nick Cavey  
Assistant Director of Government and External Relations  
Maryland Insurance Administration  
200 St. Paul Place, Suite 2700  
Baltimore, MD 21202  
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SENT VIA E-MAIL

RE: Plan Year 2017 Benchmark Plan Discussion

Dear Mr. Cavey:

On behalf of Delta Dental of Maryland, which provides dental benefits to more than 400,000 enrollees in the State of Maryland, I am pleased to have the opportunity to submit comments on the proposed benchmark for Plan Year 2017.

Currently, the plans for the small group and individual market offered through the Maryland Health Connection utilize CHIP benefits as the benchmark for pediatric dental essential health benefits. The three largest small group plans that are being evaluated for 2017 – CareFirst BlueChoice HMO HSA/HRA, CareFirst BlueChoice HMO Referral, and United Health Insurance Company PPO Plan - are all very similar to the benefits as currently structured. However, the two CareFirst plans are the closest to what we currently offer. The UnitedHealthcare plan appears to be comprehensive for pediatric dental; however, the plan documents do not go into enough detail, particularly on limitations and frequencies, for us to assess whether it aligns with the CHIP benefits.

Therefore, should the United Health Insurance Company PPO plan be chosen as the PY 2017 benchmark plan, we would respectfully request that the pediatric dental benefits be described in more detail so that we may draft our pediatric EHB benefits accordingly. And, whichever plan is chosen, we would like to request that the state provide the detailed benefit information (including procedure codes and frequency limitations) of the dental benefits. This will help with developing a plan that is “substantially equal” to the benchmark.

Sincerely,

*Signature on original*

Jeff Album  
Vice President, Public and Government Affairs