Maryland
INSURANCE ADMINISTRATION

December 1, 2025

VIA Email

The Honorable Mike McKay
James Senate Office Building, Room 416
11 Bladen Street
Annapolis, MD 21401

The Honorable Heather Bagnall
Lowe House Office Building, Room 160
6 Bladen Street
Annapolis, MD 214011

Dear Senator McKay and Delegate Bagnall:

We write in response to your request that the Maryland Insurance Administration ("MIA"), in relation to Senate Bill 456 and House Bill 265 of 2025 as introduced, study whether dental insurance carriers are using an online dental credentialing system and to provide recommendations to expand the utilization of these systems to process uniform credentialing forms among dental insurance carriers.

In summary, the MIA's Market Analysis Unit conducted a survey on dental carriers' use of online credentialing systems in the state of Maryland. The survey letters were sent out to 30 companies and they were given two weeks to respond. The questions consisted of inquiries into whether or not they currently use an online credentialing system, if they have plans to in the future, and why they did not utilize one if they indicated they did not. We found that 23 of the 30 companies did utilize an online credentialing system. Of the seven remaining, one was fully exempted from the survey and another which was exempted because they utilized three network partners for dental credentialing, each which was surveyed individually. Two companies intended to implement an online system in the future, and three others did not intend to implement an online credentialing system, most commonly citing cost as their reasoning.

Background

In furtherance of this report, the MIA's Market Analysis Unit conducted a survey on dental carriers' use of online credentialing systems in the state of Maryland. The survey contained 3 questions:

- First on the utilization of an online credentialing system as defined in §15-112 of the Insurance Article and whether they accept the form through the Council for Affordable Quality Healthcare (CAQH) or their own proprietary system;
- Second on whether the carrier intends to utilize an online credentialing system in the future if they will accept it through CAQH or their proprietary system; and
- Third on why, if they responded no to the first two questions, the carrier does not utilize an online credentialing system nor plans to do so in the future.

The survey letters were sent out to 30 companies on July 2, 2025. The companies were given two weeks to respond to this inquiry, thus the due date was July 16, 2025.

Survey Responses

Question #1 Results:

After analyzing the responses, it was found that 23 of the 30 (76.7%) companies currently utilize an online credentialing system to process uniform credentialing forms.

It was found that five of the 30 (16.7%) companies do not currently utilize an online credentialing system to process uniform credentialing forms.

Two of the 30 companies were not included in the above listings. The reasons are explained below:

- One company responded saying that it "[does] not offer any Dental products in Maryland and therefore does not credential nor delegate credentialing for dental providers." The response was accepted by the MIA; therefore, they were exempted from responding to the survey.
- The other company had three network partners, all of which answered the survey:
  - o Two of the three (66.7%) of the company's network partners currently utilize an online credentialing system to process uniform credentialing forms. Both accept the form through the CAQH system.
  - o The company's third network partner does not currently utilize an online credentialing system to process uniform credentialing forms.[1]

17 out of the 23 (73.9%) companies that currently utilize an online credentialing system to process uniform credentialing forms, accept the form through the CAQH system.

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[1] This network partner is discussed in depth in the section "Question #3 Results."

Three companies also accept the form through non-online systems. The explanations provided by each company in their response is as follows:

- "[The company] also makes the standard Maryland credentialing application available through its website. Providers can submit completed credentialing applications through the mail, via facsimile, by email or directly via a link on [the company's] website."

- "If a provider does not utilize CAQH, [the company] contacts the provider directly to obtain the documentation necessary for credentialing via email, fax or regular mail. Ultimately, all applications are then provided to our outsourced certified Credentials Verification Organization (CVO), which handles the process of verifying the qualifications and credentials of dentists wishing to join our provider network."

- "[The company] also makes the standard Maryland credentialing application available through its website. Providers can submit completed credentialing applications through the mail, via facsimile, by email or directly via a link on [the company's] website."

One company's contracted Dental Provider Organization answered the survey. As stated in the company's response:

"[The contracted Dental Provider Organization] uses State mandated Credentialing applications. The State of Maryland mandates the CAQH Application which [the contracted Dental Provider Organization] uses and has access to the CAQH website to pull these applications and any required documents for credentialing provider[s] as needed."

Six of the 23 (26.1%) companies that currently utilize an online credentialing system to process uniform credentialing forms, accept the form through both the CAQH system and their own proprietary system.

Question #2 Results:

Three of the five companies (60%) that do not currently utilize an online credentialing system to process uniform credentialing forms, also do not plan to do so in the future.

Two of the five (40%) companies that do not currently utilize an online credentialing system to process uniform credentialing forms, do plan to do so in the future. Those two companies provided following explanations in their responses:
- "[The company] plans to use a third-party platform other than the NCQA system. Specifically, [the company's] administrator has engaged a vendor to pursue an online credentialing system which would process the uniform credentialing form. While the initial

project is in another market for a separate line of business, [the vendor] would be rolled out enterprise-wide, including to [the company's] Maryland business, upon satisfactory proof of concept and based on business need sometime in the future."

- "[The company] is in the process of evaluating various third-party software solutions that offer online credentialing."

Questions #3 Results:

One company had 3 network partners who were responsible for their dental credentialing processes. All partners responded to the survey, but only one does not currently utilize an online credentialing system to process uniform credentialing forms, nor plans to do so in the future, and their reason was the following:

- "In alignment with Maryland Insurance § 15-112, which governs provider credentialing, participation criteria, and notification requirements, [network partner] performs all credentialing in-house using our proprietary provider management software. While we do not utilize an external online credentialing system such as CAQH, we do utilize Maryland's CAQH form. This system allows us to efficiently manage credentialing workflows while maintaining full compliance with state regulations. Our credentialing process follows the standards and best practices outlined by the National Committee for Quality Assurance (NCQA), ensuring a thorough and consistent review of provider qualifications. We adhere to the required timeframes for application acknowledgment and credentialing completion, and we provide transparent communication regarding participation decisions and any contractual updates."

Three more companies do not currently utilize an online credentialing system to process uniform credentialing forms, nor plan to do so in the future. Two of the three (66.7%) companies explained costs as being one of the reasons. Their explanations provided in the survey responses are as follows:

- "[The company] previously used an external vendor for provider credentialing. This process was recently absorbed internally which required funding, staffing, and training. Due to the demands of the recent transition and the potential costs of a new system, there are no plans at this time to revise current processes."

- "The company sells dental plans exclusively to residents of skilled nursing facilities. For this reason, we do not have a need for a high volume of provider credentialing. We work with providers that have mobile equipment and provide dental care on-site and the individual's place of residence (the skilled nursing facility)."

- "The cost of establishing an online system would be quite burdensome for us as we are a fairly new small company with a very small Maryland presence at this time."

Conclusion and Recommendations

The results of the survey indicate that the majority of Maryland dental insurers currently utilize an online dental credentialing system as defined in § 15-112 of the Insurance Article. Of those companies who did not currently utilize an online dental credentialing system, several indicated they were in the process of transitioning to an online system. Of those who did not have any future plans to transition to an online system, cost was the primary barrier for participation.

Based on the responses received, recommendations to expand the utilization of online dental credentialing systems include the following:
- Formally designating the CAQH form for online dental credentialing (this will likely require a statute change, as Maryland law indicates the designated form should be for a non-profit entity and CAQH recently became for-profit,).
- Explore ways to increase the accessibility of the CAQH form, including reducing cost barriers.

Thank you for your work on behalf of Marylanders and your encouragement to our agency to examine this important issue. We look forward to continued collaboration on issues impacting Marylanders.

Respectfully Submitted,

Marie Grant
Insurance Commissioner

cc: Sarah T. Albert, Department of Legislative Services (5 copies)