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November 13, 2017

Lisa Larson
Regulations Manager
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, MD 21202

Dear Ms. Larson:

Thank you for the opportunity to comment on proposed regulations under COMAR 31.10.45 to establish network adequacy regulations for dental plans. The Maryland Assembly on School-Based Health Care (MASBHC) appreciates the work of the Maryland Insurance Administration (MIA) to work with stakeholders in developing network adequacy regulations. The proposed regulations help advance standards that will help ensure consumers have sufficient access to dental providers.

We recommend the inclusion of school-based health centers (ECPs) in the definition of essential community providers (ECPs). The MHBE recognizes several different provider types in addition to providers types qualified under the federal definition. In the proposed regulations for dental plans, the MIA recognized all these State-defined providers with the exception of SBHCs. We believe this was a technical oversight.

SBHCs provide health care services to low-income children in K-12 schools. Not every SBHC offers dental services. However, when a SBHC does offer dental services, it is because there is a provider shortage in the community. SBHCs are essential community providers, as families depend on them to access dental services. Given the importance of ensuring access to pediatric dental services, it only makes sense for providers of our most underserved communities are recognized.

Thank you for the opportunity to submit these comments. If we can provide any additional information, please contact Robyn Elliott, our public policy and governmental affairs consultant, at relliott@policypartners.net or (443) 926-3443.

Sincerely,
Donna Behrens
Co-Chair