

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 the proposed regulations for dental network adequacy standards under COMAR 31.10.45. The Maryland Dental Action Coalition (MDAC) is very appreciative of the efforts of the Maryland Insurance Administration (MIA) in incorporating stakeholders into the regulatory process.

When proposed regulations are implemented, the MIA will have a meaningful tool to ensure there are a sufficient number of dentists in a provider network. Consumers need sufficient access to in-network providers or else they will face high out-of-pocket costs. Many consumers delay or even forgo needed care when it is unaffordable.

We support the MIA's approach with the proposed regulations. By including both distance and wait times, the standards will help ensure that consumers will be able to access a provider who is reasonably close within a reasonable period of time. The standards recognize that there are different providers for children and adult populations. The standards also distinguish amongst different specialties including endodontic and orthodontics.

We have two recommendations regarding the definition of essential community provider (ECP):

- We strongly advocate for the inclusion of school-based health centers that offer dental care in the definition. School-based health centers may be the primary source of dental care for children in areas, such as the Eastern Shore, where there is a shortage of providers. It is important to children and their families for these providers to be in-network.

We support the comments submitted by the Maryland Assembly on School-Based Health Care (MASBHC) regarding this issue. As MASBHC explains, the exclusion of school-based health centers from the definition would lead to confusion amongst both providers and carriers.

- It appears as though there is a technical error. The proposed regulations do not reference the federal definition of ECP under 45 CFR 156.235(c).

Thank you again for your efforts in developing these regulations. If MDAC could be helpful in any way, please contact Robyn Elliott, our public policy and governmental affairs consultant, at (443) 926-3443 or [relliott@policypartners.net](mailto:relliott@policypartners.net).

Sincerely,



Mary Backley  
Executive Director