



February 3, 2017

The Honorable Al Redmer, Jr.  
Maryland Insurance Administration  
200 St. Paul Place, Suite 2700  
Baltimore, MD 21202  
Sent via email to: [networkadequacy.mia@maryland.gov](mailto:networkadequacy.mia@maryland.gov)

Dear Administrator Redmer:

The National Association of Dental Plans (NADP) and the Alliance of Maryland Dental Plans (Alliance) applauds the Maryland Insurance Administration (MIA) on taking an active and transparent role in promulgating regulations on provider networks per Maryland House Bill 1318 / Chapter 309 "Health Benefit Plans – Network Access Standards and Provider Network Directories."

NADP participated in the arduous process of updating the National Association of Insurance Commissioners (NAIC) Health Benefit Plan Network Access and Adequacy Model Act (Model) and recommends taking a similar approach with future regulations.

NADP and the Alliance testified on January 5 at the MIA dental network hearing and discussed several points for the MIA to consider, including:

**Recommendation 1:** The MIA should review consumer complaints and dental plans' network filings to determine whether further regulations or dental metrics are appropriate and to what degree. Maryland is among the minority of states with dental network regulations already in place, and may learn additional oversight will only lead to higher costs, without any additional benefits to consumers. It is critical to remember the costs associated with additional regulations as dental coverage is a voluntary benefit. While pediatric dental is included in the Essential Health Benefits package of the Affordable Care Act, individuals are not required to report the lack of coverage on their tax forms and dental is therefore not a required benefit, unlike medical Minimum Essential Coverage.

**Recommendation 2:** If the MIA decides to move forward with specific network requirements, NADP and the Alliance propose the MIA adopt dental metrics as utilized in the CMS Medicare Advantage program (MA) as suggested within the 2016 CMS Letters to Issuers for mileage or time to a dental provider:

- Large: 30 minutes or 15 miles
- Metro: 45 minutes or 30 miles
- Micro: 80 minutes or 60 miles
- Rural: 90 minutes or 75 miles
- CEAC: 125 minutes or 110 miles
- At least 1 provider for at least 90% of enrollees

The MA dental metric provides a solid measuring stick for dental networks, and while most dental carriers can meet the CMS metric therefore not disrupting current coverage, it will allow for a baseline for new carriers entering the state. However, NADP urges the MIA to include flexibility within the regulations so the MIA can work with carriers' filings in the event complications arise, such as new shortage areas becoming apparent or providers refusing to join networks.

As additional states look to implement potential metrics for dental networks, NADP and the Alliance are proposing parallel regulations to assist both carriers and agencies in simplifying processes to keep costs to a minimum. As dental coverage is a low-cost benefit, it is even more critical to have state metrics align whenever feasible.

**Recommendation 3:** There was discussion during the dental hearing requesting Essential Community Providers (ECP) be required as part of the networks to parallel CMS requirements of the Federal Facilitated Marketplaces (FFM). NADP and the Alliance oppose this suggestion for several reasons.

The FFM is designed for the individual market and mainly serves an un/underinsured population, typically including Federally Qualified Health Centers (FQHC), some of which have dentists. However, the regulations being discussed are impacting dental policies filed for the employer market, which is not a sector that has traditionally utilized FQHCs. As long as there are an appropriate number of providers available to consumers, there is no reason for a network provider to be specifically designated as an ECP or other.

In addition, dental plans have found it very difficult each year to meet the FFM ECP dental ratio, as most ECP Dentists have declined to contract with commercial dental plans. Additionally, CMS lists identifying FQHCs that offer dental services are often in error or the locations only provide limited services (e.g. an examination by a dental hygienist or dentist services only available at certain limited times). Our plans have acknowledged including ECPs within their networks have been problematic, expensive and not advantageous for their enrollees as long as other providers are available in the same geographic region. Also, and if implemented at the state level, Maryland would need to continue supplying an updated list of ECPs and address the data integrity issues in current listings.

**Recommendation 4:** Similar to the legislation, NADP and the Alliance also recommend the MIA maintain any dental requirements separately to provide ongoing clarification on regulatory reporting, and encourage simplicity when filing policies for MIA approval in the future.

The dental benefits industry wants to continue to be proactive and offer practical solutions that can also streamline processes when feasible. We will continue to offer a balanced approach as the MIA continues their conversation throughout the remainder of the Model review. The identification of clear, specific and reasonable dental requirements will assist in containing costs and thus providing Maryland constituents more affordable coverage options.

Please do not hesitate to contact Eme Augustini at (972) 458-6998 x111 or [eaugustini@nadp.org](mailto:eaugustini@nadp.org) or Kimberly Robinson at 410-375-2523 or [krobinson@fblaw.com](mailto:krobinson@fblaw.com) should you have any questions or concerns.

We've also attached a Maryland dental state fact sheet for reference along with NADP's member list. We greatly appreciate the MIA's open dialogue and look forward to meaningful discussions this summer.

Sincerely,



Eme Augustini  
Director of Government Relations  
National Association of Dental Plans (NADP)



Kimberly Robinson,  
Executive Director  
Alliance of Maryland Dental Plans

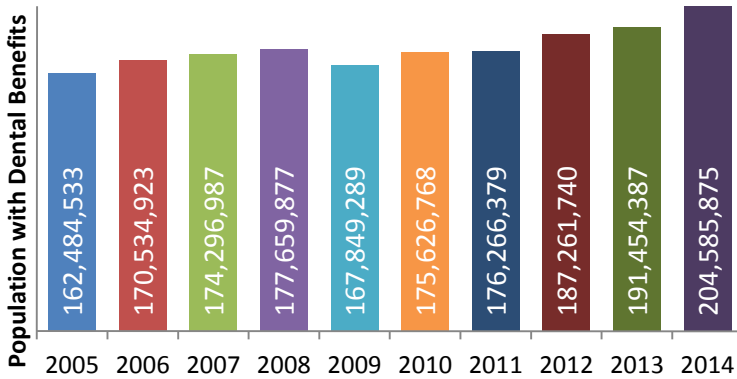
# Maryland

## Dental Benefits Fact Sheet



### National Enrollment Trends

An estimated 204,585,875 Americans, 64% of the population, have dental benefits.



Source: 2015 NADP Dental Benefits Report on Enrollment

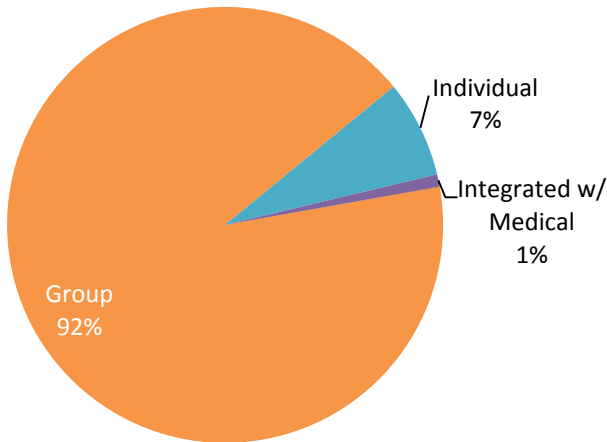
### Dental Enrollment

An estimated 4,585,274 or 77% of the population have dental benefits in Maryland.

Plan Type	Enrollment
<b>Private Plans</b>	
DHMO	453,056
DPPO	2,729,163
Indemnity	225,290
Other Private	64,724
<b>Public Plans</b>	
Medicaid/CHIP <sup>41</sup>	1,082,153

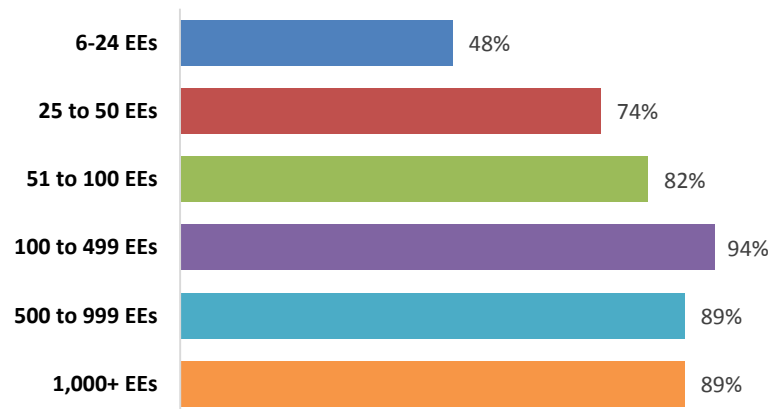
Source: Data from the Centers for Medicare and Medicaid Services and 2015 NADP Dental Benefits Report on Enrollment

### Sources of Private Dental Coverage



Source: 2015 NADP Dental Benefits Report on Enrollment

### Employers Offering Dental Benefits by Employer Size



Source: 2015 NADP Survey of Employers

### Premium Facts

Maryland	DHMO	DPPO	Indemnity
Small Group	--	\$34.36	\$40.66
Large Group	--	\$28.38	--
Individual	--	\$31.10	--
Nat'l All Group Avg	\$17.01	\$31.69	\$36.13

Source: NADP 2015 Dental Benefits Report: Premium and Benefit Utilization Trends

### Distribution of Commercial Benefits: State vs National

	DHMO	DPPO	Indemnity	Other
<b>Maryland</b>	9.9%	59.5%	4.9%	1.4%
<b>National</b>	7.9%	78.9%	6.8%	6.4%

Source: 2015 NADP Dental Benefits Report on Enrollment

# Maryland Dental Benefits Fact Sheet

## Workforce NADP Members

The federal standard for an adequate supply of dentists is 3.33 practicing dentists per 10,000 population.<sup>42</sup>

The table presents the number of dentists participating on provider networks including the number of network dentists per 10,000 population

Network Type	Total Dentist	General Dentists	Pediatric Dentists	Specialists	Per 10,000
DHMO	971	577	43	351	1.62
DPPO	4,930	3,785	233	912	8.25
Discount	3,032	2,267	152	613	5.07

Source: 2015 NADP/DDPA Joint Dental Benefits Report on Network Statistics and U.S. Department of Health and Human Services

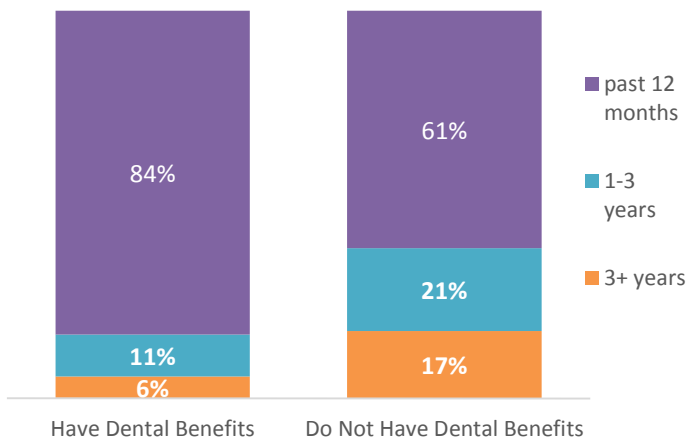
### Plan Types Offered by NADP Members



Source: 2015 NADP Membership Directory

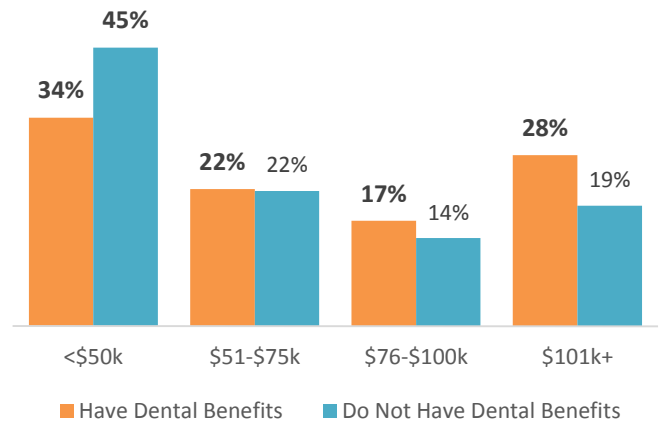
## Dental Benefits Impact Consumer Behavior Who Has Dental Benefits

### When was your last visit to the dentist?



Source: 2015 NADP Survey of Consumers

### Consumers with and without Dental Benefits by Household Income



Source: 2015 NADP Survey of Consumers

## About



The National Association of Dental Plans (NADP), a nonprofit corporation with headquarters in Dallas, Texas, is the “representative and recognized resource of the dental benefits industry.” NADP is the only national trade organization that includes the full spectrum of dental benefits companies operating in the United States. NADP’s members provide dental benefits to about 90 percent of 205 million Americans with dental benefits.

# NADP MEMBERS & SUBSIDIARIES



Last Updated: August 2016

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## Plan Members

### **Advantage Dental Plan, Inc.**

#### **Aetna Dental**

Coventry Dental  
Group Dental Service  
Group Dental Service of MD

#### **Altus Dental Insurance Company**

#### **American Dental Professional Services**

American Dental Partners

#### **American Enterprise Group, Inc.**

#### **Ameritas Life Insurance Corp.**

Ameritas Life Insurance Corp. of NY  
Security Life Insurance Company of America

#### **Anthem Blue Cross Blue Shield**

Anthem Health & Life Insurance Company  
Blue Cross Blue Shield of GA  
Blue Cross Blue Shield of MO  
Blue Cross Blue Shield of WI  
Blue Cross of CA  
DeCare International  
Golden West Dental & Vision Plan  
Unicare Health Ins Co of the Midwest  
Unicare Life and Health Insurance Company  
WellPoint

#### **Argus Dental and Vision**

#### **Best Life and Health Insurance Company**

#### **Blue Cross Blue Shield of AZ**

#### **Blue Cross Blue Shield of MA**

Benefit Services of HI (Blue Shield of HI)  
Florida Blue  
Florida Combined Life Insurance Company  
HMSA (Blue Cross and Blue Shield of HI)  
Life and Specialty Ventures  
USABLE Life

#### **Blue Cross Blue Shield of MI**

Blue Care Network

#### **Blue Cross Blue Shield of NC**

#### **Blue Cross Blue Shield of SC**

#### **Blue Shield of CA**

#### **Care Plus/Dental Associates**

#### **CareFirst BlueCross BlueShield**

The Dental Network, Inc.

#### **Careington International**

#### **CBA Inc.**

#### **Cigna**

Great West Healthcare

Great West Life

#### **Companion Life Insurance Company**

Alpha Dental of AI  
Alpha Dental of AZ  
Alpha Dental of NM  
Alpha Dental of NV  
Alpha Dental of UT  
Alpha Dental Plan of Colorado, Inc.  
Alpha Dental Programs, Inc  
Dental Source of New Mexico  
Total Dental Administrators

#### **Dedicated Dental / Interdent**

#### **:DentalPlans**

#### **Delta Dental of AR**

#### **Delta Dental of CA, NY, PA & Affiliates**

Delta Dental Insurance Company (DC)  
Delta Dental Insurance Company (DE)  
Delta Dental Insurance Company (MD)  
Delta Dental Insurance Company (WV)  
Delta Dental of DC  
Delta Dental of DE  
Delta Dental of MD  
Delta Dental of NY  
Delta Dental of PA  
Delta Dental of Puerto Rico & Virgin Islands  
Delta Reinsurance Corporation

#### **Delta Dental of IA**

#### **Delta Dental of MA**

#### **Delta Dental of MI, IN, OH**

#### **Delta Dental of MO**

Advantica Benefits  
Advantica Eyecare  
Bridgeport Dental  
Delta Dental of SC  
DeniServ, LLC

#### **Delta Dental of NC**

#### **Delta Dental of NM**

#### **Delta Dental of RI**

#### **Delta Dental of TN**

#### **Delta Dental of WI**

#### **DENCAP Dental Plans**

#### **Dental Care Plus Group**

Dental Trust/Dental Span

**Dental Health Services of America**

Custom Benefit Advisors  
DBA-Preferred Administrators  
Dental Health Services (an Oregon corp)  
Dental Health Services, Inc.  
Dental Health Services, Inc. (Arizona corp)  
Dental Management Services  
Dental Network Services  
DHS Insurance Services Inc

**Dental Network of America, Inc.**

Blue Cross Blue Shield of IL  
Blue Cross Blue Shield of MT  
Blue Cross Blue Shield of NM  
Blue Cross Blue Shield of OK  
Blue Cross Blue Shield of TX  
Colorado Bankers Life  
Dearborn National  
DenteMax  
Ft. Dearborn Life Ins Co  
Health Care Service Corp  
Medical Life Ins Co

**Dental Select****DentaQuest**

Atlantic Dental, Inc.  
California Dental Network, Inc.  
Delta Dental of MA  
DentaQuest Institute  
DentaQuest MidAtlantic  
Doral Dental USA, LLC  
DSM USA Insurance Company Inc

**Dominion National**

Capital Advantage Assurance Co.  
Capital Blue Cross

**EmblemHealth Services**

Albany Dental  
Connecticare  
GHI HMO Select  
Group Health Inc (now Emblem)

**EMI Health****First Continental Life****GEHA**

PPO USA Inc.  
Surety Life

**Guardian Life Insurance Company of America**

Access Dental Services  
Avesis Third Party Admin. Inc.  
Berkshire Life Insurance Company of America  
First Commonwealth Limited  
First Commonwealth, Inc.  
Managed Dental Care

Managed DentalGuard  
Premier Access / Guardian Life

**Health Resources, Inc.****HealthNet of CA****HealthPartners, Inc**

Central Minnesota Group Health Inc  
Group Health Plan Inc  
HealthPartners Administrators, Inc.  
Midwest Assurance Company

**Horizon Blue Cross Blue Shield of NJ**

Rayant Dental Services Inc

**Humana Insurance Company**

CompBenefits Corporation  
Oral Health Services

**IHC Health Solutions**

American National Life Ins. Company  
Fidelity Security Life  
GroupLink Reinsurance Company LTD  
Guarantee Trust Life  
Independence Holding Company  
Madison National Life Ins Co  
Strategic Health Alliance

**Kaiser Permanente Dental Care Program**

Permanente Dental Associates

**Kansas City Life Insurance Co.****LIBERTY Dental Plan****Lifemap Assurance****Lincoln Financial Group****MetLife**

SafeGuard Dental and Vision  
SafeGuard Health Enterprises  
SafeGuard Health Plans, Inc

**Mutual of Omaha Insurance Company**

Omega Administrators

**National Guardian Life Insurance Company****Nevada Dental Benefits**

PrimeCare Dental Plan (Jaimini Health, Inc.)

**Nippon Life Insurance Company of America****Northeast Delta Dental**

Delta Dental of NH  
Maine Dental Service Corp

**Pacific Source Health Plans****Pan American Life**

The Dental Specialists

**Physicians Mutual Insurance Company****Premera Blue Cross**

Blue Cross of WA and AK  
Lifewise Assurance  
Lifewise Health Plan of OR  
Premera Blue Cross Blue Shield of AK

**Principal**

Diversified Dental Services  
Employers Dental Services, Inc.  
First Dental Health  
New Dental Choice (First Dental Health)  
Principal Dental Services  
Principal Life Insurance Company

**Renaissance Life & Health Ins. Company**

Maverest Dental  
Renaissance Dental  
Renaissance Health Inc. Company of NY

**SelectHealth****Solstice Benefits****Southland National Insurance Corporation****Standard Insurance Company****Starmount Life Insurance Company**

Always Care  
UNUM Life Ins. Co. of America

**Sun Life Financial**

Dental Health Alliance, LLC  
Denticare of Alabama  
Denticare of Oklahoma  
Denticare, Inc. a Kentucky Corporation  
Denticare, Inc., a Florida Corporation  
UDC Dental California, Inc.  
Union Security Dental Care of New Jersey  
Union Security Dental Care of Georgia, Inc  
Union Security Insurance Company  
Union Security Life Ins. Company of NY  
United Dental Care of Arizona  
United Dental Care of Colorado  
United Dental Care of Michigan, Inc.  
United Dental Care of Missouri, Inc.  
United Dental Care of Ohio, Inc.  
United Dental Care of Texas, Inc.  
United Dental Care of Utah, Inc.

Genworth Financial

**Superior Dental Care, Inc****The CDI Group, Inc.****TruAssure Insurance Company**

Delta Dental of IL

**United Concordia Companies, Inc.**

Highmark  
Highmark Blue Cross Blue Shield of WV (Mountain St)  
HM Health Solutions  
Mountain State Blue Cross Blue Shield  
United Concordia Life & Health

**UnitedHealthcare Dental**

Dental Benefit Providers, Inc.  
Illinois Pacific Dental  
Ingenix  
Logistics Health Incorporated  
MAMSI Life & Health Insurance Company  
National Pacific Dental  
Nevada Pacific Dental  
OptumHealth Financial  
OptumInsight  
Oxford Health Plans  
Pacific Union Dental  
PacifiCare Dental & Vision  
PacificDental Benefits, Inc.  
United Health Care Corporation  
UnitedHealthcare Dental / Dental Benefit Providers of CA

**UPMC Health Plan****Western Dental Services, Inc****Willamette Dental Insurance, Inc.**

Willamette Dental Group  
Willamette Dental Group (Skoutes, Inc.)  
Willamette Dental Management Corporation  
Willamette Dental of Idaho, Inc.  
Willamette Dental of Washington, Inc.



## Associates

Aspen Dental Management Inc  
Benevis Practice Services  
Coast Dental Services, LLC  
Dental Care Alliance  
DentalOne Partners, Inc.  
Great Expressions Dental Centers

Heartland Dental Care  
Midwest Dental  
New York University  
Pacific Dental Services  
Park Dental  
Smile Brands Inc.

## Supporting Organizations

Aldera  
Apex Revenue Technologies  
BeneCare  
BFC Forms  
Brighter.com  
Dentistat, Inc. & go2dental.com, Inc.  
EHG, Inc Dentalxchange  
Eldorado  
FraudLens, Inc.  
Health Solutions Plus  
Healthscape Advisors  
Information Capture Solutions, LLC  
Milliman Inc.  
National Electronic Attachment

NextGen  
Nova Net  
P & R Dental Strategies, LLC  
Pacific Resources  
Revolv  
SKYGEN USA  
Stratose  
Tesia Clearinghouse, LLC  
The Ignition Group  
The Premier Dental Group, Inc.  
Unitas Dental  
West Monroe Partners  
Willis Towers Watson

## Individuals

Dr. Roger Adams  
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Dr. Manny Chopra  
Jeff DeCapua  
Dr. D.E. FitzGerald  
Gail Garcia  
Lynda Hunnicutt  
Dr. Mark W. Jurkovich  
Dr. Chris Kamen  
Dr. Steven Keller  
James Kingston  
Steve Klister  
Dolores Kordek

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E. Craig Lesley  
Tom Limoli, Jr.  
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Connor Loftus  
Robert Maccario  
Dana Moss  
Allan Morris  
Michael S. Reeder  
Dr. James Spivey  
Chuck Stewart  
Ruth Ann Woodley