



May 27, 2016

Commissioner Ralph T. Hudgens  
Office of Insurance and Safety Fire Commissioner  
Two Martin Luther King, Jr. Drive  
West Tower, Suite 704  
Atlanta, GA 30334  
Sent via Email

Dear Commissioner Hudgens;

The National Association of Dental Plans (NADP) would like to provide insight and recommendations to the Office of Insurance as you move towards implementation of Senate Bill (SB) 302 related to network adequacy and provider directories. NADP has been active in working with the National Association of Insurance Commissioners (NAIC) in development of their Network Adequacy Model Act as dental requirements may need to vary significantly from medical.

Reviewing SB 302, there are several concerns we wanted to bring to your attention in the hope they will be considered in future bulletins and regulations. Dental-specific issues include the following:

- **Recommendation 1:** There is confusion surrounding the requirement on terminating a provider from a network if a claim has not been filed within a year and the provider does not respond to issuer outreach. This will become problematic for dental carriers; while not a common occurrence, providers serving in rural communities may not file claims in a given year with a dental carrier. Rural providers are often a critical resource for communities with limited access to dental services.

This policy involves additional complexity for the provision of leased networks. In a case where two carriers lease a network, and a network provider (also known as a third party administrator) receives a claim for one carrier during the year and not the other, how should the network or the carriers implement this policy?

NADP recommends the Office of Insurance provide flexibility to dental carriers by requiring plans remove unresponsive providers with no annual claims from the *directory*. A provider could later be removed from the *network* when the carrier reengages the provider during the credentialing process and discussion.

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National Association of Dental Plans

12700 Park Central Drive • Suite 400 • Dallas, Texas 75251

972.458.6998 • 972.458.2258 [fax]

nadp.org

"the representative and recognized resource of the dental benefits industry"



- **Recommendation 2:** The full review of a carrier's network must be completed by January 1, 2017 while implementation timelines for the remaining standards are not specified. NADP requests the information required within the directories as listed in Section 33-20C-4 and 33-20C-5 also follow this timeframe. There are certain requirements which are not common elements in dental directories; for instance, several carriers have not gathered gender information previously, as included in Section 33-20C-4(a)(1)(B) and to do so by the bill's effective date of July 1, 2016 is not feasible.

NADP recommends the Department require field elements for online and print directories be updated no earlier than January 1, 2017.

- **Clarification:** Section 33-20C-4 listing data fields for the online provider directory includes specific section (2) and (3) referencing hospitals and facilities with an exemption in subsection (b) for standalone dental plans. A parallel exemption was not included in the next section referencing print directories. NADP believes this is a clerical oversight and encourages clarification in upcoming regulations.

Currently, there are minimal directory inaccuracies within dental networks, nor are dental carriers narrowing their networks or adding various tiers, which was the focus of SB 302. NADP encourages the Office of Insurance to consider flexibility and alternatives when it comes to regulatory oversight related to dental networks.

NADP greatly appreciates your time and attention to our concerns and hopes the department will consider our recommendations. Attached is a dental state fact sheet on Georgia as well as NADP's member listing for your background. If you should have any questions on network or other dental issues, please do not hesitate to contact me at [khathaway@nadp.org](mailto:khathaway@nadp.org) or (972)458-6998x111.

Sincerely,



Kris Hathaway  
Director of Government Relations  
National Association of Dental Plans

#### **NADP DESCRIPTION**

NADP is the largest non-profit trade association focused exclusively on the dental benefits industry, i.e. dental PPOs, dental HMOs, discount saving plans and dental indemnity products. NADP's members provide dental benefits to more than 92 percent of the 205 million Americans with dental benefits. Our members include the entire spectrum of dental carriers: companies that provide both medical and dental coverage, companies that provide only dental coverage, major national carriers, regional, and single state companies, as well as companies organized as non-profit plans.

National Association of Dental Plans

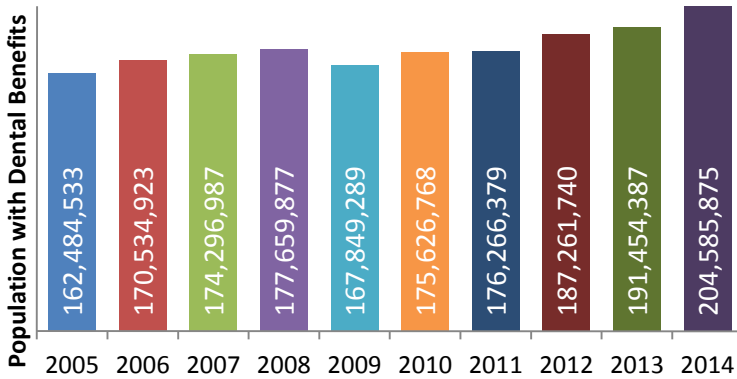
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972.458.6998 • 972.458.2258 [fax]



### National Enrollment Trends

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



Source: 2015 NADP Dental Benefits Report on Enrollment

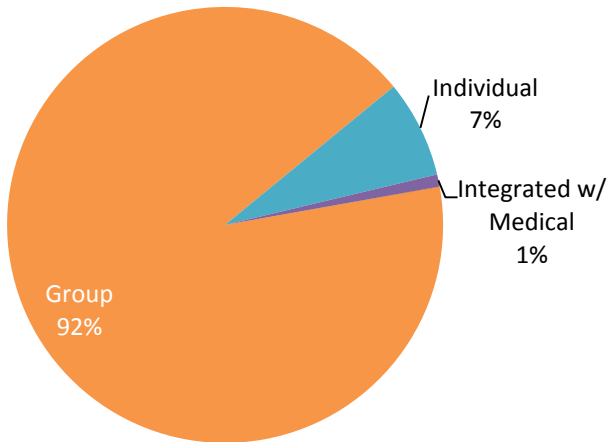
### Dental Enrollment

An estimated 5,374,120 or 53% of the population have dental benefits in Georgia.

Plan Type	Enrollment
<b>Private Plans</b>	
DHMO	192,592
DPPO	3,953,158
Indemnity	205,385
Other Private	111,062
<b>Public Plans</b>	
Medicaid/CHIP <sup>21</sup>	902,041

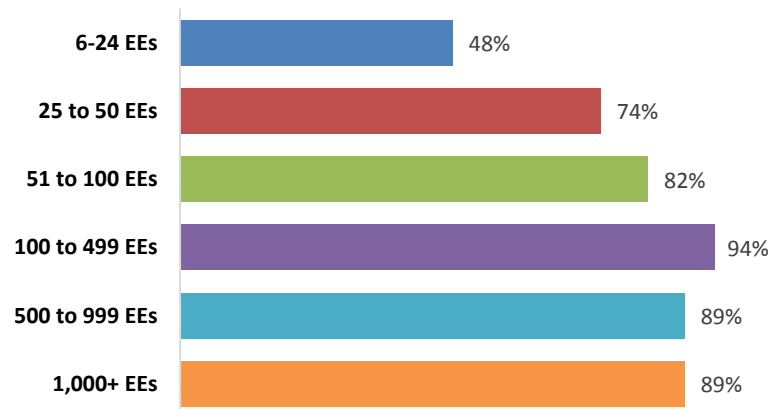
Source: Data from the Centers for Medicare and Medicaid Services and 2015 NADP Dental Benefits Report on Enrollment

### 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

Georgia	DHMO	DPPO	Indemnity
Small Group	--	\$34.42	\$42.04
Large Group	--	\$30.82	--
Individual	--	--	--
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>Georgia</b>	3.6%	73.6%	3.8%	2.1%
<b>National</b>	7.9%	78.9%	6.8%	6.4%

Source: 2015 NADP Dental Benefits Report on Enrollment

# Georgia Dental Benefits Fact Sheet

## Workforce

The federal standard for an adequate supply of dentists is 3.33 practicing dentists per 10,000 population.<sup>22</sup>

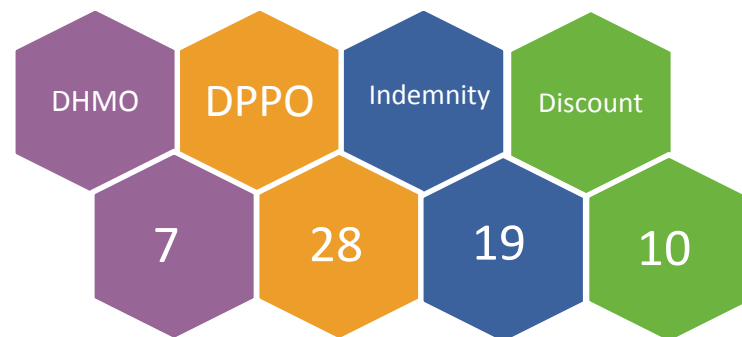
The table presents the number of dentists participating on provider networks including the number of network dentists per 10,000 population

Network Type	Total Dentist	General Dentists	Pediatric Dentists	Specialists	Per 10,000
DHMO	750	470	57	223	0.74
DPPO	4,429	3,359	284	786	4.39
Discount	2,696	2,071	195	430	2.67

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

## NADP Members

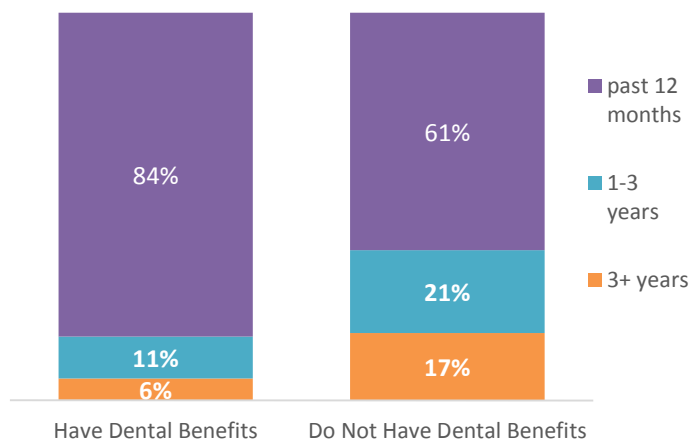
### Plan Types Offered by NADP Members



Source: 2015 NADP Membership Directory

## Dental Benefits Impact Consumer Behavior

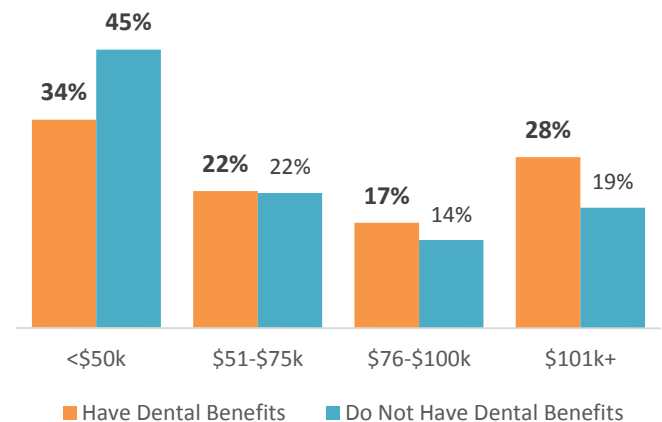
### When was your last visit to the dentist?



Source: 2015 NADP Survey of Consumers

## Who Has Dental Benefits

### 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: May 2016



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**Advantage Dental Plan****Aetna Dental**

*Group Dental Service*

**Altus Dental Ins Co****American Dental Professional Svcs**

*American Dental Partners*

**American Enterprise Group**

*Medco Benefits*

**Ameritas Life Ins Corp.**

*First Ameritas Life Ins Corp.*

**Anthem Blue Cross Blue Shield**

*Anthem Health & Life Ins Co*

*Blue Cross Blue Shield of GA*

*Blue Cross Blue Shield of MO*

*Blue Cross Blue Shield of WI*

*Blue Cross of CA*

*DeCare*

*Golden West Dental & Vision Plan*

*Unicare Health Ins Co of the Midwest*

*Unicare Life and Health Ins Co*

*WellPoint*

**Argus Dental Plan, Inc.****Assurant Employee Benefits**

*Dental Health Alliance, LLC*

*DentCare, Inc. a Kentucky corporation*

*DentiCare of Alabama, Inc.*

*DentiCare of Oklahoma, Inc.*

*DentiCare, Inc. a Florida corporation*

*First Fortis Life Ins Co*

*Fortis Benefits DentalCare of New Jersey In*

*Fortis Benefits DentalCare of WI, Inc.*

*Fortis Benefits Ins Co*

*Fortis Dental Benefits*

*Georgia Dental Plan, Inc.*

*UDC Life and Health Ins Co*

*Union Security Life Ins Co of NY*

*United Dental Care Ins Co*

*United Dental Care of Arizona, Inc.*

*United Dental Care of Colorado, Inc.*

*United Dental Care of Michigan, Inc.*

*United Dental Care of Missouri, Inc.*

*United Dental Care of Nebraska*

*United Dental Care of New Mexico, Inc.*

*United Dental Care of Ohio, Inc.*

*United Dental Care of Pennsylvania, Inc.*

*United Dental Care of Texas, Inc.*

*United Dental Care of Utah, Inc.*

*United Dental Ins. Company*

**Best Life and Health Ins Co****Blue Cross Blue Shield of AZ****Blue Cross Blue Shield of MI**

*Blue Care Network*

*Blue Care Network of East MI*

**Blue Cross Blue Shield of NC****Blue Cross Blue Shield of NE****Blue Cross Blue Shield of SC****Blue Cross Blue Shield of RI****Blue Shield of CA****CareFirst BlueCross BlueShield**

*The Dental Network, Inc.*

**CAREINGTON INTERNATIONAL****CarePlus**

*Dental Associates*

**CBA, Inc.**

*Blue Cross of Vermont*

**The CDI Group****Cigna Dental & Vision Care**

*Great West Healthcare*

**Companion Life Ins Co****Dedicated Dental / Interdent****Delta Dental of CA**

*Alpha Delta of AL*

*Alpha Delta of AZ*

*Alpha Delta of NV*

*Delta Dental Ins. Co. (DE)*

*Delta Dental Ins. Co. (DC)*

*Delta Dental Ins. Co. (MD)*

*Delta Dental of NY*

*Delta Dental of PA*

*Delta Dental Ins. Co. (PR & VI)*

*Delta Dental of PR & VI*

*Delta Dental Ins. Co. (WV)*

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

*Delta Care*

*Delta Dental of AR*

*Delta Dental of TN*

**Delta Dental of MO**

*Advantica Benefits*

**Delta Dental of RI****Delta Dental of MA****Delta Dental of WI****DENCAP Dental Plans****Dental Care Plus Group Inc.****Dental Health Svcs of America**

*Custom Benefit Advisors*

*DBA-Preferred Administrators*

*Dental Health Svcs (an Oregon corp)*

*Dental Health Svcs, Inc.*

*Dental Health Svcs, Inc. (Arizona corp)*

*Dental Management Svcs*

*Dental Network Svcs*  
*DHS Ins Svcs Inc*  
**Dental Network of America, Inc. (DNOA)**  
*Blue Cross Blue Shield of IL*  
*Blue Cross Blue Shield of NM*  
*Blue Cross Blue Shield of TX*  
*Colorado Bankers Life*  
*Dearborn National*  
*DenteMax, Inc.*  
*Ft. Dearborn Life Ins Co*  
*Health Care Svcs Corp*  
*Medical Life Ins Co*  
**Dental Select**  
**DentalPlans.com**  
**DentaQuest**  
**Dominion Dental Svcs, Inc**  
**EMI Health**  
**EmblemHealth Svcs**  
*Connecticare*  
*GHI HMO Select*  
*Group Health Inc*  
**Employee Choice**  
*Blue Cross Blue Shield of LA*  
**First Continental Life**  
**GEHA**  
*PPO USA*  
**Guardian Life Ins Co of America**  
*Berkshire Life Ins Co of America*  
*First Commonwealth, Inc.*  
*Managed Dental Care*  
**Health Resources, Inc.**  
**HealthNet**  
**HealthPartners, Inc**  
*Central Minnesota Group Health Inc*  
*Group Health Plan Inc*  
*HealthPartners Administrators, Inc.*  
*Midwest Assurance Company*  
**Horizon BCBS NJ**  
**Humana Ins. Co.**  
*CompBenefits Corporation*  
*Oral Health Svcs*  
**IHC Health Solutions**  
*American National Life Ins. Company*  
*Fidelity Security Life*  
*GroupLink Reins Co LTD*  
*Guarantee Trust Life*  
*Madison National Life Ins Co*  
*Strategic Health Alliance*  
**Kaiser Permanente Dental Care Program**  
**Kansas City Life Ins Co**  
**Liberty Dental Plan**  
**Lifemap Assurance**  
**Life and Specialty Ventures**  
*Blue Cross and Blue Shield of Arkansas*  
*HMSA (Blue Cross and Blue Shield of Hawaii)*  
*Florida Blue*  
*Blue Cross Blue Shield of MA*  
*Florida Combined Life Ins Co*  
*USable Life*  
**Lincoln Financial Group**  
**MetLife**  
*SafeGuard Dental and Vision*  
*SafeGuard Health Plans, Inc*  
*SafeGuard Health Enterprises*  
**Mutual of Omaha**  
**National Guardian Life Ins Co**  
**Nationwide Mutual Ins Co**  
**Nevada Dental Benefits**  
**NexDent**  
**Nippon Life Ins Co of America**  
**Northeast Delta Dental**  
**Pacific Source Health Plans**  
**Pan American Life**  
**Physicians Mutual**  
**Premera Blue Cross**  
*Blue Cross of WA and AK*  
*Lifewise Assurance*  
*Lifewise Health Plan of OR*  
*Premera Blue Cross Blue Shield of AK*  
**Principal Financial Group**  
*Diversified Dental Svcs*  
*Employers Dental Svcs, Inc.*  
**Renaissance Life & Health Ins. Company**  
*Renaissance Dental Network*  
*Renaissance Health Inc. Company of NY*  
**Security Life Ins Co of America**  
*Union Security Life Ins. Company of NY*  
**SelectHealth**  
**Solstice Benefits**  
**Southland National Ins Corporation**  
**Standard Ins Co**  
**Starmount Life Ins Co**  
*Always Care*  
**Sun Life Financial**  
**Superior Dental Care Inc.**  
**TruAssure**  
**United Concordia Companies Inc.**  
*Blue Cross Blue Shield of WV (Mountain St)*  
*Highmark Blue Cross Blue Shield*  
*United Concordia Life & Health*  
**United Healthcare Specialty Benefits**  
*Dental Benefit Providers, Inc.*  
*Illinois Pacific Dental*  
*MAMSI Life & Health Ins Co*  
*National Pacific Dental*  
*Nevada Pacific Dental*  
*Oxford Health Plans*  
*Pacific Union Dental*  
*PacifiCare Dental & Vision*  
*PacificDental Benefits, Inc.*  
*Solstice Benefits*  
*United Health Care Corporation*

## **UPMC Health Plan**

### **Western Dental Svcs**

#### **Willamette Dental Insurance, Inc**

*Willamette Dental Group*

*Willamette Dental Management Corporation*

*Willamette Dental of Idaho, Inc.*

*Willamette Dental of Washington, Inc.*

*Willamette Dental Group (Skoutes, Inc.)*

#### **Associate Members**

*Aspen Dental*

*Benevis*

*Coast Dental*

*Dental Associates*

*Dental Care Alliance*

*DentalOne Partners*

*Great Expression Dental Centers*

*Heartland Dental Care*

*North American Dental Group*

*Pacific Dental Services*

*Park Dental*

*Smile Brands Inc.*

#### **Supporting Organizations**

*Aldera*

*Beam Dental Technologies*

*BeneCare*

*Brighter*

*Dentistat, Inc. & go2dental.com, Inc.*

*EHG*

*Eldorado*

*Health Care Excel*

*Health Solutions Plus*

*Healthscape Advisors*

*McKenna, Long & Aldridge*

*McKinsey and Company*

*Milliman Inc.*

*NextGen*

*Nova Net*

*P & R Dental Strategies, Inc.*

*Perio Protech*

*Plexis Healthcare*

*Pure Perio*

*Revolv (formerly Corvesta)*

*Secure EDI*

*Sprig Health*

*Stratose*

*Tesia Clearinghouse*

*The Ignition Group*

*The Premier Dental Group, Inc.*

*Towers Watson*

*West Monroe Partners*

*Wonderbox Technologies*

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*Dr. Manny Chopra*

*Dr. Leigh Colby*

*Jeff DeCapua*

*Teresa Duncan*

*Dr. D.E. FitzGerald*

*Lynda Hunnicutt*

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*James Kingston*

*Dr. David Klock, Ph.D.*

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*Tom Limoli, Jr.*

*James Lintner*

*Allan Morris*

*David O. Mulligan*

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*Chuck Stewart*

*Dr. Doyle Williams*

*Ruth Ann Woodley*