



June 14, 2013

Mr. Dale Bruggeman, Chairman
Statutory Accounting Principles Working Group
National Association of Insurance Commissioners
2301 McGee Street, Suite 800
Kansas City, MO 64108-2604
Sent via email: jgann@naic.org and jgann@naic.org

Re: NAIC Ref No. 2011-38

Dear Mr. Bruggeman:

The National Association of Dental Plans (NADP) is providing comments on *Fees Payable to the Federal Government by Health Insurers* per the rules for accounting Section 9010 fees (Fee) imposed by the Affordable Care Act.

NADP signed onto the interested party letter forwarded in May to the SAPWG, and continues to be concerned on the accrual of fees. In a joint letter from AHIP and BCBSA, an alternative approach for the recognition of the Fee is proposed per SAPWG members' request. The proposal meets the Working Group's specific requirements that the Fees assessed and paid in a particular year be reported on the face of the financial statements.

Proposed federal rules apply these fees to stand-alone dental plans. As the majority of dental plans are small, regional or single state carriers with limited margins, the impact by the implementation of the assessment fee is critical to our members. NADP urges SAPWG to adopt the compromise proposal set forth by AHIP and BCBSA so that our members can continue to provide affordable and quality dental benefits to all consumers.

We greatly appreciate the opportunity to provide our comments to the SAPWG. Thank you for your attention to this critical issue. Attached is a list of NADP members, and if you have any questions, please forward them to NADP's Director of Government Relations, Kris Hathaway at khathaway@ndap.org, khathaway@nadp.org.

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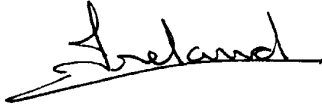
National Association of Dental Plans

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Sincerely,



Evelyn F. Ireland, CAE
Executive Director
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 dental plans and dental indemnity products. NADP's members provide dental benefits to over 92 percent of the 176 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.

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NADP MEMBERS & SUBSIDIARIES

Last Updated: June 2013



Access Dental/Premier Access

Advantage Dental Plan

Aetna Dental

AIG Benefit Solutions

Altus Dental Ins Co

Delta Dental of RI

American Dental Professional Svcs

American Dental Partners

AmeriPlan Corporation

Ameritas Life Ins Corp.

First Ameritas Life Ins Corp.

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

Avesis Third Party Admin. Inc.

Best Life and Health Ins Co

Blue Cross Blue Shield of AZ

Blue Cross Blue Shield of MA

Blue Shield of Arkansas

Blue Shield of Hawaii

Blue Cross of Florida

Florida Combined Life Ins Co

USAbLe Life

Life & Specialty Ventures

Blue Cross Blue Shield of MI

Blue Care Network

Blue Care Network of East MI

Blue Cross Blue Shield of NC

ACS Benefit Svcs, Inc.

Blue Shield of CA

CareFirst BlueCross BlueShield

The Dental Network, Inc.

CAREINGTON INTERNATIONAL

CIGNA Dental & Vision Care

Great West Healthcare

Citizens Security Life Ins Co

Coastal Dental

Companion Life Ins Co

Total Dental Administrators

Dedicated Dental / Interdent

Delta Dental of CA, NY, PA & Affiliates

Delta Dental of AK

Delta Dental of AL

Delta Dental of DC

Delta Dental of DE

Delta Dental of GA

Delta Dental of LA

Delta Dental of MD

Delta Dental of MS

Delta Dental of MT

Delta Dental of NV

Delta Dental of TX

Delta Dental of UT

Delta Dental of VT

Delta Dental of WV

Denti-Cal

Delta Dental of IA

Delta Dental of IL

Delta Dental of MI, OH, IN

Delta Care

Delta Dental of AR

Delta Dental of TN

Renaissance Dental Network

Renaissance Health Inc. Company of NY

Renaissance Life & Health Ins. Company

Delta Dental of MO

Advantica Benefits

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

GEHA

PPO USA a Division of GEHA

Guardian Life Ins Co of America

Berkshire Life Ins Co of America
First Commonwealth, Inc.
Managed Dental Care

Health Resources, Inc.

HealthPartners, Inc

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

Humana Specialty Benefits

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

Lincoln Financial Group

MetLife

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

Mutual of Omaha

National Guardian Life Ins Co

Nevada Dental Benefits

Nippon Life Ins Co of America

Northeast Delta Dental

Pacific Source Health Plans

Pan American Life

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.

Reserve National

Risk Solutions Resources

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.

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

WellPoint Dental Svcs

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

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
Dental Care Alliance
DentalOne Partners
Great Expression Dental Centers
Kool Smiles
Heartland Dental Care
Pacific Dental Services
Park Dental
Smile Brands Inc.*

Supporting Organizations

*Colonial Life & Accident Ins Co
Davis Vision
Direct Benefits
Dental Elite
DentalInsurance.com (Kelsey National)
Dentistat, Inc. & go2dental.com, Inc.
Health Solutions Plus
Healthation, LLC
Healthscape Advisors
National Electronic Attachment, Inc.
McKinsey and Company
Milliman Inc.
P & R Dental Strategies, Inc.
Revolv (formerly Corvesta)
Secure EDI
Stratose, formerly Coalition America Inc.
The Ignition Group
The Premier Dental Group, Inc.
Towers Watson
Verisk Health
West Monroe Partners
Wonderbox Technologies*

Individual Members

*Dr. Peter Barnett
Jeff DeCapua
Dr. D.E. FitzGerald
Christy Ferreri
Lynda Hunnicutt
Dr. Steven Keller
James Kingston
Dr. David Klock, Ph.D.
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Ruth Ann Woodley*