



July 5, 2013

The Honorable Nancy Wyman
Lieutenant Governor of Connecticut
Chair, Access Health CT Board of Directors

Mr. Kevin Counihan
Chief Executive Officer
Access Health CT

280 Trumbull Street, 15th Floor
Hartford, CT 06103
Submitted via email to Margo.Lachowicz@ct.gov

RE: Exchange Assessments and Fees Procedure

Dear Ms. Wyman and Mr. Counihan,

The National Association of Dental Plans (NADP) appreciates the opportunity to provide comments on the Notice of Intent to Adopt Procedure regarding Exchange Assessments and Fees published by Access Health CT.

The draft proposal authorizes the Board of Directors and staff of the Exchange to charge assessments to carriers offering health coverage in the state of Connecticut. Due to specific language in Connecticut General Statutes section 38a-1083(c)(7), the draft policy would charge assessments and user fees to health and dental carriers that are *capable of offering* plans through the exchange.

From a recent email forwarded by Access Health CT to a NADP member we have been informed that currently separate dental policies will not be offered on the Connecticut Exchange. Therefore, dental carriers will not be “capable” of offering plans on the Exchange and must be excluded from application of all fees until able to participate on the Exchange.

Once the policy has changed and dental carriers may offer policies on the Exchange (as they do today for 99% of consumers with dental coverage), then user fees should be applied only within the small group and individual market to parallel guidelines set for medical carriers.

The draft proposal provides choices on how dental fees should be collected. NADP recommends Access Health CT adopt a policy that is fair among all carriers offering policies of all different costs on the Exchange by collecting a user fee that is proportionate to the consumer’s

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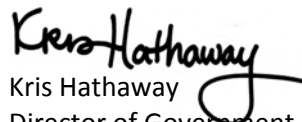
premium. As a dental premium is on average 1/12 of a medical premium, a fee collected on the proportion of a consumer's separate premiums would be considered reasonable and nondiscriminatory and is currently the method employed by all other Exchanges.

RECOMMENDATIONS:

- Clarify the proposal to delay application of assessments and fees on dental plans until they are *capable of* and allowed to participate on Access Health CT.
- Once dental plan participation is permitted on Access Health CT, clarify the proposal to allow Board and Exchange staff to apply a proportionate collection of fees based on each premium.

NADP is appreciative for the opportunity to provide comments on the draft procedure. For additional information, attached is a dental fact sheet for Connecticut that you may find useful. NADP looks forward to future discussions on the critical issues we addressed above. Please contact me with any questions regarding these comments at khathaway@nadp.org or 972 458-6998x111. Again, thank you for your consideration.

Sincerely,



Kris Hathaway
Director of Government Relations
National Association of Dental Plans
12700 Park Central Dr., Suite 400
Dallas, TX 75251

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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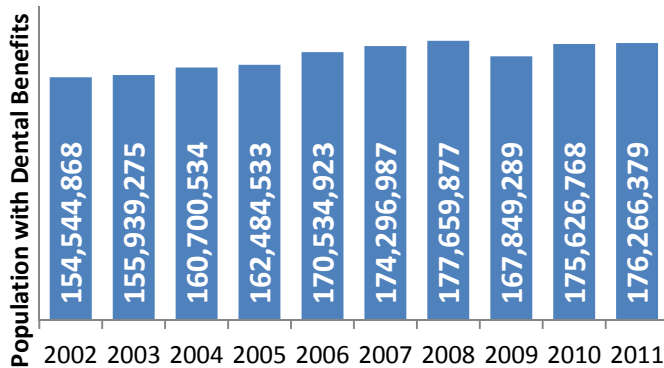
Connecticut

Dental Benefits Fact Sheet

National Enrollment Trends

State Enrollment

Enrollment



Source: 2012 NADP/DDPA Joint Dental Benefits Report on Enrollment

An estimated 1,921,280 people are enrolled in a private dental plan from Connecticut.

Private Plan Enrollment

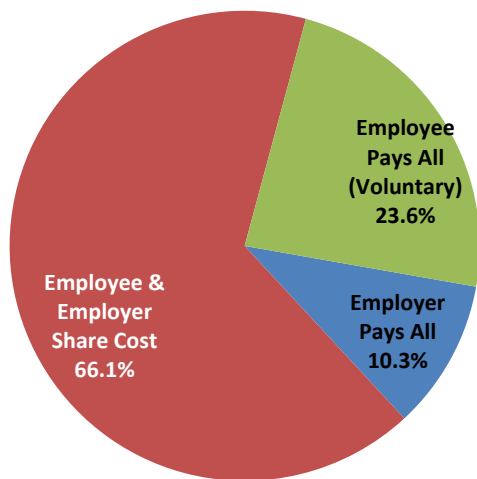
Plan Type	Enrollment
DHMO	85,447
DPPO	1,714,839
Indemnity	97,729
Other Private	23,265

Public Plan Enrollment

Medicaid/CHIP ¹	10,328
Other Public	121

Source: 2012 NADP/DDPA Joint Dental Benefits Report on Enrollment

Group Policy Funding

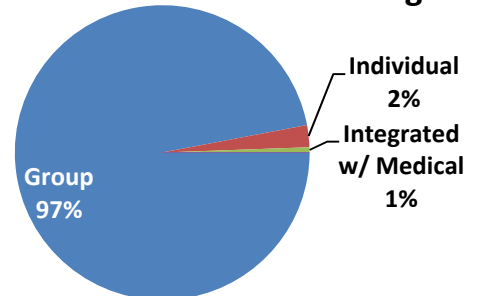


Source: 2012 NADP/DDPA Joint Dental Benefits Report on Enrollment

Distribution of Commercial Benefits: State v. National

	DHMO	DPPO	Indemnity	Other
Connecticut	4.4%	89.3%	5.1%	1.2%
National	8.4%	77.2%	9.0%	5.4%

Sources of Private Dental Coverage



Source: 2012 NADP/DDPA Joint Dental Benefits Report on Enrollment

Premium Facts

Nationally, premium increases for existing group coverage ranged from 0.1% for DPPO products to 1.8% for Dental Indemnity products.²

Average monthly dental premium per member per month in Connecticut:

DPPO: \$46.16

¹ Data from the Center for Medicare and Medicaid Services. If 0, then CMS data is not available.

² NADP 2012 Premium and Benefit Utilization Trends

Connecticut Dental Benefits Fact Sheet

Workforce

The federal standard for an adequate supply of dentists is 3.33 practicing dentists per 10,000 population.³

According to the American Dental Association, 2,475 dentists are actively practicing in Connecticut or 6.91 dentists per 10,000 population.⁴

Network Type	Total Dentists	General Dentists	Pediatric Dentists	Specialists
DHMO	381	212	10	159
DPPO	2,386	1,722	87	577
Discount	1,570	1,210	303	303

Source: 2012 NADP/DDPA Joint Dental Benefits Report on Network Statistics

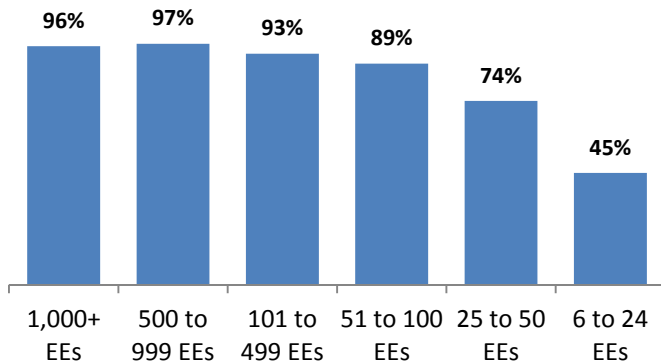
NADP Members

Plan Type	NADP Members Offering Dental Plans
DHMO	5
DPPO	22
Indemnity	11
Discount	11

Source: 2012 NADP Membership Directory

Where do Consumers Get Dental Benefits

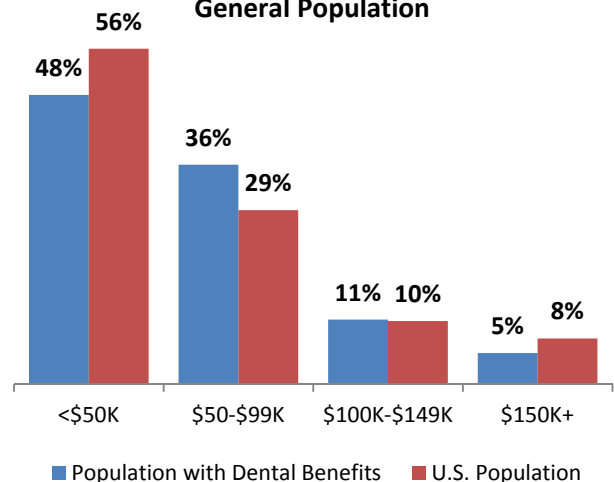
Employers Offering Dental Benefits by Employer Size



Source: 2011 NADP Purchaser Behavior Survey

Who Has Dental Benefits?

Consumers with Dental Benefits by Household Income compared to General Population



Source: 2012 NADP Survey of Consumers

About NADP

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 HMO, Dental PPO, Dental Indemnity and Discount Dental products to 160 million Americans, more than 80% of all the dental benefits in the U.S.

³ U.S. Department of Health and Human Services

⁴ American Dental Association