



September 27, 2013

Jamie Walker  
Associate Commissioner  
Texas Department of Insurance  
333 Guadalupe  
Austin, TX 78714-9104  
Submitted via email to [NavigatorRegistration@tdi.texas.gov](mailto:NavigatorRegistration@tdi.texas.gov)

RE: Rule Development and Implementation Strategy for SB 1795

Dear Commissioner Walker,

The National Association of Dental Plans (NADP) appreciates the opportunity to provide comments on the development and implementation of SB 1795 on regulation of navigators in Texas.

As you are aware, the Affordable Care Act (ACA) sets a specific group of benefits, i.e. Essential Health Benefits (EHB) as the minimum health coverage that can be offered in the Marketplace. Part of this set of benefits is “pediatric services, including oral and vision care.”

In the Marketplace, if consumers want to purchase child-only or family dental coverage they can either purchase dental benefits as a separate policy or purchase a medical policy which has dental coverage embedded in that policy. Through federal regulations, dental policies have different requirements than medical policies, including: Actuarial Value (AV) levels, maximum out of pocket limits, cost sharing structures and other important factors. It is important for navigators to understand the variations between dental policies to best assist the consumer.

The PEW Center on the States estimates that about 5.3 million additional children will get dental coverage under the ACA. These studies reflect an anticipated interest in coverage for children and families that should be addressed by Navigator personnel.

Due to the complexity of dental benefits within the ACA, NADP recommends the Department consider developing additional training for navigators on the availability of essential pediatric dental benefits and family dental coverage on the Marketplace.

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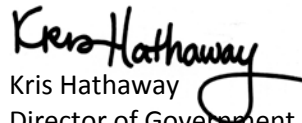
972.458.6998 • 972.458.2258 [fax]



NADP is appreciative for the opportunity to provide comments on the training of navigators, and we look forward to future discussions on these critical issues. NADP maintains information on dental benefits within the ACA and would be happy to provide further information as the Department develops its own educational materials for navigators.

For additional information, attached is a dental fact sheet for Texas that you may find useful. Please contact me with any questions regarding these comments at [khathaway@nadp.org](mailto: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.

National Association of Dental Plans

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[nadp.org](http://nadp.org)

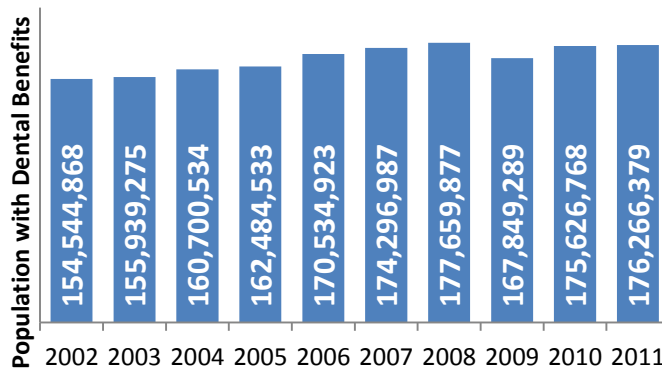
"the representative and recognized resource of the dental benefits industry"



### National Enrollment Trends

### State Enrollment

### Enrollment



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

An estimated 9,692,551 people are enrolled in a private dental plan from Texas.

#### Private Plan Enrollment

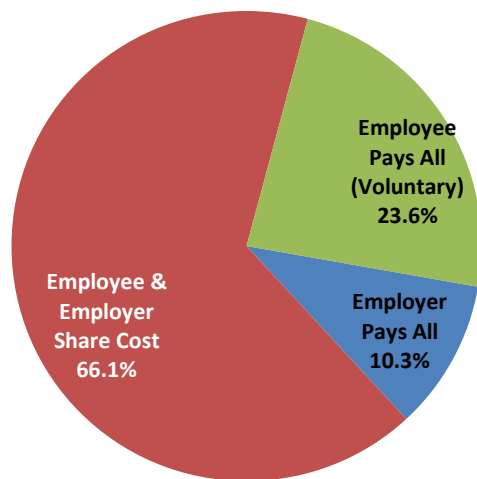
Plan Type	Enrollment
DHMO	689,900
DPPO	7,962,704
Indemnity	339,725
Other Private	700,222

#### Public Plan Enrollment

Medicaid/CHIP <sup>1</sup>	690,381
Other Public	1,955,475

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

### Group Policy Funding

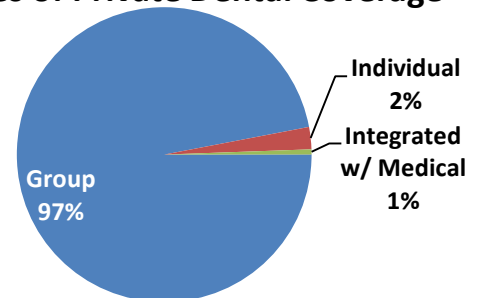


Source: 2012 NADP/DDPA Joint Dental Benefits Report on Enrollment

### Distribution of Commercial Benefits: State v. National

	DHMO	DPPO	Indemnity	Other
Texas	7.1%	82.2%	3.5%	7.2%
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.<sup>2</sup>

Average monthly dental premium per member per month in Texas:

DPPO: \$ 29.25

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

<sup>2</sup> NADP 2012 Premium and Benefit Utilization Trends

# Texas Dental Benefits Fact Sheet

## Workforce

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

According to the American Dental Association, 10,492 dentists are actively practicing in Texas or 4.09 dentists per 10,000 population.<sup>4</sup>

Network Type	Total Dentists	General Dentists	Pediatric Dentists	Specialists
DHMO	1,640	1,083	85	471
DPPO	10,587	8,135	497	1,949
Discount	6,996	5,406	1,232	1,232

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

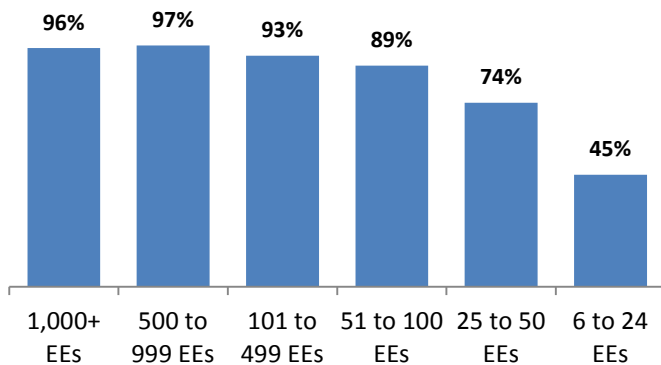
## NADP Members

Plan Type	NADP Members Offering Dental Plans
DHMO	5
DPPO	32
Indemnity	18
Discount	13

Source: 2012 NADP Membership Directory

## Where do Consumers Get Dental Benefits

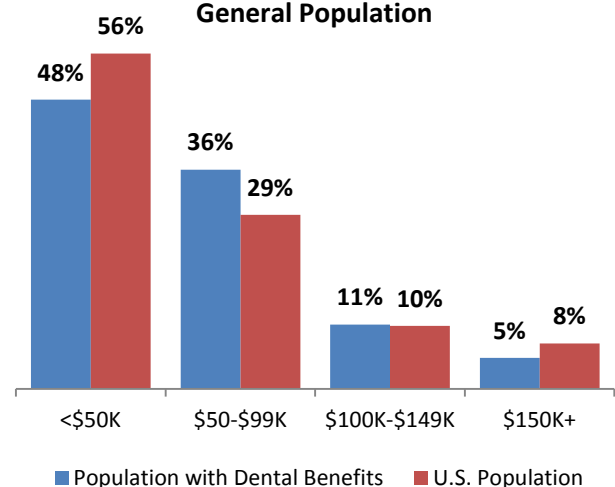
Employers Offering Dental Benefits by Employer Size



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.

<sup>3</sup> U.S. Department of Health and Human Services

<sup>4</sup> American Dental Association