



September 7, 2018

The Honorable Jarome M. Adams, MD
United States Surgeon General
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Humphrey Building, STE 701H
Washington, DC 20201

Dear Dr. Adams,

On behalf of our members, the National Association of Dental Plans (NADP) is pleased to learn of the commission of a Surgeon General's Report on prominent issues affecting oral health, which was announced in the Federal Register on July 27, 2018. As your office embarks on this project, we are writing to offer our research and expertise about the dental insurance market, including enrollment and utilization, and the state of quality-related initiatives in the dental industry.

NADP is the largest non-profit trade association focused exclusively on the dental benefits industry. NADP's members provide dental HMO, dental PPO, dental Indemnity and discount dental products to more than 195 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.

NADP is well positioned to provide input and support on all five objectives of the new Report on Oral Health as outlined in the Federal Register:

Underscore the Critical Nature of Oral Health as a Public Health Issue

Oral Health in America: A Report of the Surgeon General (2000) found that oral disease and disorders in and of themselves affect health and well-being throughout life. Since 2000, research has built on this landmark study and found oral health conditions can strain other parts of the health care system, good oral health care is associated with lower costs of treating other medical conditions, and prevention, treatment and dental benefits all play key roles in promoting oral health. Our members have conducted several studies of the impacts of dental treatment on the costs of care in the private market, and in 2017, NADP

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commissioned a review of the Medical Expenditure Panel Survey (MEPS) data¹ for consumers with Medicaid coverage that mirrored the private market results.

Provide a Comprehensive Review of the Importance of Oral Health Throughout Life, and Describe Important Contemporary Issues Affecting Oral Health and the Promise of Science to Transform the Oral Health of the Nation

NADP serves as the recognized source of research and data on the dental benefits industry. Our research reports capture the full scope of the dental insurance market including enrollment, premiums, utilization and employer and consumer opinion.

Americans need regular oral health care to sustainably improve their oral health, and dental coverage is a highly important gateway to oral health care. *Oral Health in America* recognized the positive impact of insurance on addressing the cost barrier to obtaining dental care², which is critical to maintaining dental and overall health. Subsequent research continues to show the value of dental insurance in fostering access to care. Beginning in 2007, NADP has periodically conducted a survey of Consumers on their attitudes and behaviors toward dental health and dental benefits. The study has been conducted annually since 2015. In the most recent survey, for example, we found:

- Individuals with dental coverage are 47% more likely to have visited the dentist in the past 6 months for a dental check-up;
- Those with dental benefits are significantly more likely to visit the dentist for a procedure other than routine exams and cleanings;
- 91% of those with dental benefits have a dentist or dental practice they usually go to for dental care; and
- Lack of insurance was the most common reason for not visiting the dentist, more so than fear of visiting the dentist.

Oral Health in America also found that fewer people have dental insurance than have medical insurance. While dental coverage rates have increased since 2000 due in part to increased offer of coverage by employers and within public programs, a gap remains today: 249 million Americans have dental benefits (77.7% of the population)³ while 292 million have health insurance coverage (91.2%)⁴. For children in lower income families, the dentally uninsured rate has decreased

¹ National Association of Dental Plans. (2017, November 23). NADP Analysis Shows Adults with Medicaid Preventive Dental Benefits Have Lower Medical Costs for Chronic Conditions [Press release]. Available from: <http://bit.ly/2APegde>

² U.S. Department of Health and Human Services. *Oral Health in America: A Report of the Surgeon General*. Rockville, MD: U.S. Department of Health and Human Services, National Institute of Dental and Craniofacial Research, National Institutes of Health, 2000. Pages vii, 2, 9, 12, 81-82, 86, 229, 239, 269.

³ 2017 NADP Dental Benefits Report on Enrollment.

⁴ Kaiser Family Foundation estimates based on the Census Bureau's March Current Population Survey (CPS: Annual Social and Economic Supplements), 2014-2017.

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significantly—nearly 94% of eligible children were enrolled in Medicaid or Children’s Health Insurance Programs (CHIP) in 2016.⁵

Outline a Vision for Future Directions

Quality Measures

Oral Health in America found information on the cost, cost-effectiveness and outcomes of dental treatment to be lacking—indicating a need for measurement of disease and health outcomes. Since 2000, NADP has been involved in key industry initiatives related to dental quality measures, and we stand ready to provide context and updates on this process.

At the request of CMS in 2008, the American Dental Association (ADA) was asked to take the lead in establishing the Dental Quality Alliance (DQA) as a broad-based partnership of diverse entities interested in collaboratively advancing performance measurement to improve oral health, patient care and safety. The DQA is engaged in developing quality and performance measures for Medicaid and CHIP.

DQA objectives include:

1. To identify and develop evidence-based oral health care performance measures and measurement resources.
2. To advance the effectiveness and scientific basis of clinical performance measurement and improvements.
3. To foster and support professional accountability, transparency, and value in oral health care through the development, implementation and evaluation of performance measurement.

NADP was part of the initial group of invited industry leaders and interested parties brought together to develop the structure and process that has become the DQA. Today, NADP is a voting member of the DQA and serves as the only dental benefits organization represented on the DQA Executive Committee. The DQA is the only industry organization focused on dental quality improvement and measures, and while carriers may implement various risk assessment tools, the DQA remains the primary source for development of dental quality measures.

The DQA has identified, developed and conducted validity and reliability assessments of several performance measures. As per the initial charge from CMS to the DQA, the initial measures in development were pediatric focused; i.e. sealant use, topical fluoride and care continuity. Since that time, the DQA has expanded the focus to include adult and pediatric measures such as emergency room visits and follow up visits, oral evaluation in diabetics and sealants for children at elevated risk. Each of these measures undergoes rigorous testing for feasibility, validity, reliability and usability that have allowed many of these measures to receive National Quality

⁵ Haley, J. M., Kenney, G. M., Wang, R., Lynch, V., & Buettgens, M. (2018). Medicaid/CHIP Participation Reached 93.7 Percent Among Eligible Children in 2016. *Health Affairs*, 37(8), 1194-1199. Retrieved August 8, 2018, from <https://www.healthaffairs.org/>.

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Forum (NQF) endorsement and to be adopted by federal, state and local programs to enhance the access and delivery of dental care.

The DQA has also embarked on an education program that provides direct training on the use of DQA measures, spotlights on programs that have successfully implemented dental quality measures and continues to make the measures and implementation resources available at no cost to licensed users.

DQA and its Measures Development and Maintenance Committee (MDMC) will continue to develop, test and implement new measures which are both appropriate and valid for the dental profession and dental benefits industry. As your office explores quality improvement strategies within oral health, NADP strongly encourages the review of DQA developments and innovations.

Dental Diagnostic Terminology

The development of standardized terminology to describe common oral diagnoses has lagged behind the broader medical field. Common diagnostic codes would allow for the documentation of oral health conditions specific to dentistry for individual patients and the evaluation of disease patterns and outcomes in populations.

NADP has been a part of the development and implementation of dental diagnostic terminology and actively participates on the SNODENT Canvass Committee of the ADA Standards Committee on Dental Informatics (SCDI), which reviews and approves the dental diagnostic terminology set licensed by the ADA and used in the US realm including the SNO-DDS reference set and SNO-DDS General Dentistry Reference Set. NADP further participates on the SNOMED International Dentistry Clinical Reference Group for issues related to the development, implementation and use of dental diagnostic terminology for the international realm. NADP supports the implementation of dental diagnostic terminology within the electronic dental record, electronic and paper claims processing and dental research.

Educate, Encourage, and Call Upon all Americans to Take Action

NADP develops and maintains resources for consumers as purchasers of dental benefits and the end users of dental services. NADP provides helpful information for understanding and evaluating dental benefits in an online Dental Benefits Basics series.⁶ As the Affordable Care Act was implemented, NADP released information on changes to dental benefits and encouraged consumers to review dental plan options on the public insurance Marketplaces.⁷

In addition, NADP.org includes educational content written at a ninth-grade reading level in a Consumer Resources section. Highlights include:

- “The Importance of Dental Health throughout Adulthood”

⁶ National Association of Dental Plans. Dental Benefits Basics. Retrieved September 6, 2018, from http://www.nadp.org/Dental_Benefits_Basics.aspx

⁷ National Association of Dental Plans. (2017, October 20). NADP Urges Consumers to Enroll in Dental Benefits in the Obamacare Marketplaces [Press release]. Available from: <http://bit.ly/2yx2mjk>

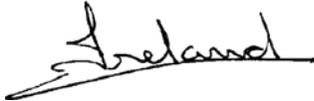


- “Why You Should Have Dental Benefits”
- Glossary of dental terms and dental insurance terms
- 2014 Oral Health Infographic listing recent ongoing research about oral-overall health connections. Research was published in professional journals and at conferences.

NADP has partnered with the National Association of Health Underwriters, March of Dimes, and American Heart Association to promote public health education campaigns around the connections between oral and overall health.

In summary, we look forward to the development of a new Surgeon General’s report on oral health, and would welcome an opportunity to meet with you in person to further discuss how NADP could serve as a resource. Should you have any questions or would like to schedule a meeting, please do not hesitate to contact NADP Director of Government Relations Eme Augustini at (972) 458-6998 x111 or eaugustini@nadp.org.

Sincerely,



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