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.
- **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 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.
Georgia

Dental Benefits Fact Sheet

National Enrollment Trends

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

Dental Enrollment

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

<table>
<thead>
<tr>
<th>Plan Type</th>
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<tbody>
<tr>
<td>DHMO</td>
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<td>DPPO</td>
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<td>Indemnity</td>
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<td>Other Private</td>
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<tr>
<td>Medicaid/CHIP</td>
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Public Plans

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<tr>
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<tbody>
<tr>
<td>Medicaid/CHIP</td>
<td>902,041</td>
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</table>

Sources of Private Dental Coverage

| Source: 2015 NADP Dental Benefits Report on Enrollment |

Employers Offering Dental Benefits by Employer Size

<table>
<thead>
<tr>
<th>Employer Size</th>
<th>Group Avg</th>
<th>Individual</th>
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<tbody>
<tr>
<td>6-24 EEs</td>
<td>$34.42</td>
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<tr>
<td>25 to 50 EEs</td>
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<td>51 to 100 EEs</td>
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<td>100 to 499 EEs</td>
<td>$36.13</td>
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<tr>
<td>500 to 999 EEs</td>
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<tr>
<td>1,000+ EEs</td>
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</table>

Premium Facts

| Source: NADP 2015 Dental Benefits Report: Premium and Benefit Utilization Trends |

Distribution of Commercial Benefits: State vs National

| Source: 2015 NADP Dental Benefits Report on Enrollment |

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

Sources

- Source: 2015 NADP Dental Benefits Report on Enrollment
- Source: Data from the Centers for Medicare and Medicaid Services and 2015 NADP Dental Benefits Report on Enrollment
- Source: 2015 NADP Survey of Employers
- 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.22

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

<table>
<thead>
<tr>
<th>Network Type</th>
<th>Total Dentist</th>
<th>General Dentists</th>
<th>Pediatric Dentists</th>
<th>Specialists</th>
<th>Per 10,000</th>
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<tr>
<td>DHMO</td>
<td>750</td>
<td>470</td>
<td>57</td>
<td>223</td>
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<td>DPPO</td>
<td>4,429</td>
<td>3,359</td>
<td>284</td>
<td>786</td>
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<td>Discount</td>
<td>2,696</td>
<td>2,071</td>
<td>195</td>
<td>430</td>
<td>2.67</td>
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</table>


Plan Types Offered by NADP Members

- DHMO: 7
- DPPO: 28
- Indemnity: 19
- Discount: 10

Source: 2015 NADP Membership Directory

Dental Benefits Impact Consumer Behavior

- **When was your last visit to the dentist?**
  - Have Dental Benefits: 84% past 12 months, 11% 1-3 years, 6% 3+ years
  - Do Not Have Dental Benefits: 61% past 12 months, 21% 1-3 years, 17% 3+ years

Source: 2015 NADP Survey of Consumers

Who Has Dental Benefits

- **Consumers with and without Dental Benefits by Household Income**
  - <$50k: 34% Have, 45% Do Not
  - $51-$75k: 22% Have, 22% Do Not
  - $76-$100k: 17% Have, 14% Do Not
  - $101k+: 28% Have, 19% Do Not

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.

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12700 Park Central Drive, Suite 400 • Dallas, Texas 75251-1529 • p 972.458.6998 f 972.458.2258 • nadp.org
<table>
<thead>
<tr>
<th>NADP MEMBERS &amp; SUBSIDIARIES</th>
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<td>Last Updated: May 2016</td>
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<tr>
<td>Advantage Dental Plan</td>
<td>Blue Cross Blue Shield of MI</td>
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<td>Aetna Dental</td>
<td>Blue Care Network</td>
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<td>Blue Cross Blue Shield of NC</td>
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<td>American Dental Professional Svcs</td>
<td>Blue Cross Blue Shield of NE</td>
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<td>Dental Health Svcs of America</td>
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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
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
PacificCare 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.

Individual Members
Dr. Peter Barnett
Dr. Manny Chopra
Dr. Leigh Colby
Jeff DeCapua
Teresa Duncan
Dr. D.E. FitzGerald
Lynda Hunnicutt
Dr. Mark W Jurkovich
Dr. Steven Keller
James Kingston
Dr. David Klock, Ph.D.
Dolores Kordek
Dr. Krefman
Dr. Nanarao Krothapalli
E. Craig Lesley
Tom Limoli, Jr.
James Lintner
Allan Morris
David O. Mulligan
Dr. James Spivey
Chuck Stewart
Dr. Doyle Williams
Ruth Ann Woodley

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