



Ms. Mary Watanabe
 Deputy Director, Health Policy and Stakeholder Relations
 California Department of Managed Health Care
 980 9th Street, Suite 500
 Sacramento, CA 95814-2724
 Sent via email to Mary.Watanabe@dmhc.ca.gov

RE: Checklist for implementation of SB 137 – Provider Directories

Dear Deputy Director Watanabe,

The National Association of Dental Plans (NADP) is concerned with the timeline required by the checklist for implementing SB 137. While we understand some deadlines may be set, NADP requests the department to allow for flexibility when availability and continued discussion with the dental benefits industry.

We have attached a letter from the California Association of Dental Plans (CADP) in hopes you will take their specific recommendations into consideration. CADP’s approach of allowing a tiered approach is common sense from both the consumer and plan perspective.

NADP greatly appreciates your time and consideration on this critical matter. Our member list is attached, and should you have any questions, please contact me at (972) 458-6998 x111 or khathaway@nadp.org.

Sincerely,


 Kris Hathaway
 Director of Government Relations

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 more than 90 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.

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March 11, 2016

Ms. Mary Watanabe
Deputy Director, Health Policy and Stakeholder Relations
California Department of Managed Health Care
980 9th Street, Suite 500
Sacramento, CA 95814-2724

Sent via email to Mary.Watanabe@dmhc.ca.gov

RE: Checklist for implementation of SB 137 – Provider Directories

Dear Deputy Director Watanabe,

CADP is the non-profit trade association focused exclusively on the dental benefits industry in California including dental PPOs, dental HMOs, discount dental plans and dental indemnity products. CADP members provide dental benefits to nearly 90 percent of the 29 million Californians with dental benefits; i.e. 8 out of 9 Californians 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 California companies, as well as companies organized as non-profit plans.

CADP greatly appreciates the Department of Managed Health Care's willingness to collaboratively discuss the implementation of SB 137 and the presentations and discussion during the CADP Legislative & Regulatory Conference earlier this week. The CADP membership was impressed with the comments shared by you and other DMHC leaders during the conference. The message of working together to find solutions was heard loud and clear.

As stated during the conference, the checklist covers significant actions required of the plans. While CADP recognizes the legislation has distinct deadlines, we are concerned many tasks cannot be completed by a July 1 deadline. We find ourselves in a position of meeting the mandated deadline rather than fully developing the processes and procedures to ultimately resolve issues outlined in the legislation.

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California Dental Network, Inc.

EXECUTIVE DIRECTOR

Timothy L Brown
brownnt@cadp.org
844-422-CADP (2237)

Ms. Mary Watanabe

March 11, 2016

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Even with DMHC's very helpful statements at the CADP Conference regarding the intention of the SB 137 checklist, the "yes or no" format places many of our plans in an untenable position. A "yes" response regarding compliance requires a complex statement of conditions to meet such compliance. A "no" response, even with an explanation, concerns plans as the checklist would be a formal attestation regarding compliance with the legislation. I believe you understood those concerns as outlined during our conversations at the CADP Conference.

While our member plans are diligently reviewing the myriad of issues contained in the checklist, our members need more time to sufficiently develop plans and implement successful resolutions.

Therefore, CADP proposes a phased implementation that allows CADP members to achieve definitive actions by July 1, but also allows flexibility to develop sufficient and effective ways to resolve complex issues rather than rushing to implement incomplete solutions to meet the July 1 deadline.

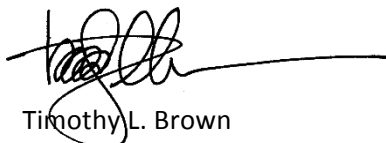
We are in the process of surveying CADP members to determine a schedule of tasks that could be fully implemented by the compliance commencement date of July 1 along with an outline of ways the other more detailed and complex issues could be achieved; i.e. within 60 days of July 1, within 90 days, etc. We believe there are actions focused on consumers that can be achieved in a timely fashion but see solutions for providers needing more activity and planning to implement.

We request a meeting with you and other appropriate DMHC staff the week of March 28th to discuss a phased implementation and provide outlines of tasks that could be completed by July 1 along with timely solutions to the larger issues requiring more development. Since there is a shared responsibility between DMHC and the California Department of Insurance, we are open to a coordinated meeting with both agencies to discuss. If CADP needs to contact CDI to coordinate, please let me know and we can facilitate a joint discussion.

CADP welcomes this opportunity and is committed to finding solutions that meet the deadlines of the legislation and allows flexibility in timing via a phased implementation on the more detailed tasks needed to fully implement the legislative requirements in an efficient and appropriate manner.

We look forward to your suggestion on a meeting time the week of March 28 and continuing dialogue. Please contact me with meeting date suggestions or any questions.

Respectfully,



Timothy L. Brown
Executive Director

cc: CADP Board of Directors
CADP Legislative & Regulatory Committee

NADP MEMBERS & SUBSIDIARIES

Last Updated: January 2016



Advantage Dental Plan**Aetna Dental**

Group Dental Service

Altus Dental Ins Co**American Dental Professional Svcs**

American Dental Partners

American Enterprise Group

Medco Benefits

Ameritas Life Ins Corp.

First Ameritas Life Ins Corp.

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

WellPoint

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

Best Life and Health Ins Co**Blue Cross Blue Shield of AZ****Blue Cross Blue Shield of MI**

Blue Care Network

Blue Care Network of East MI

Blue Cross Blue Shield of NC**Blue Cross Blue Shield of NE****Blue Cross Blue Shield of SC****Blue Cross Blue Shield of RI****Blue Shield of CA****CareFirst BlueCross BlueShield**

The Dental Network, Inc.

CAREINGTON INTERNATIONAL**CarePlus**

Dental Associates

CBA, Inc.

Blue Cross of Vermont

The CDI Group**Cigna Dental & Vision Care**

Great West Healthcare

Companion Life Ins Co**Dedicated Dental / Interdent****Delta Dental of CA**

Alpha Delta of AL

Alpha Delta of AZ

Alpha Delta of NV

Delta Dental Ins. Co. (DE)

Delta Dental Ins. Co. (DC)

Delta Dental Ins. Co. (MD)

Delta Dental of NY

Delta Dental of PA

Delta Dental Ins. Co. (PR & VI)

Delta Dental of PR & VI

Delta Dental Ins. Co. (WV)

Delta Dental of IA**Delta Dental of MI, OH, IN**

Delta Care

Delta Dental of AR

Delta Dental of TN

Delta Dental of MO

Advantica Benefits

Delta Dental of RI**Delta Dental of MA****Delta Dental of WI****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
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
PacifiCare 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.*

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.
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West Monroe Partners
Wonderbox Technologies*

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