



July 14, 2016

Mr. Mariano Romero
OSI Records Management Bureau
1120 Paseo de Peralta, Room 331
P. O. Box 1689
Santa Fe, NM 87504-1689
ATTN: Docket No. 16-00021-RULE-LH
Sent via Email and Mail

Dear Mr. Romero,

The National Association of Dental Plans (NADP) is responding with written comments to the draft rule and Section 13.10.28 regarding Provider Payment and Provider Credentialing.

Among other requirements, the proposal would require health carriers only use the hospital services corporation (HSC) or Council for Affordable Quality Healthcare (CAQH) forms for credentialing or re-credentialing. These forms are specific to medical networks and were not designed for use by dental plans and providers. They include entries that are not applicable and/or unnecessary for the dental industry. The vast majority of the over 40 pages of the CAQH form cannot be utilized by dental plans, and in fact NADP’s pilot project (detailed below) only includes one page of core data elements and one page for the attestation by the Dentist.

Although there is not an explicit exclusion, we believe the Applicability and Definitions sections of the proposed rule does not include standalone dental plans; however, the Department should clarify this more fully in future drafts or guidance.

In addition to the credentialing form, OSI has included reporting requirements within the written credential verification plan, many of which dental plans do not collect, such as 13.10.28(2)(d) “number of providers terminated for reasons of quality.” If this relates to quality of care, the dental profession does not utilize diagnostic codes which are the basis of quality outcomes. Dental plans mainly terminate due to fraud, dental board sanctions or consumer complaints. There are also reporting requirements on credentialing applications, but with more than 80% of Dentists operating within Dental PPO networks, the industry accepts, and continues to grow their dental networks, making these requirements costly to report and unnecessary.

- **Recommendation:** Due to the unique position of standalone dental plans and dental provider networks, we urge the OSI to specifically exclude standalone dental plans from this regulation.

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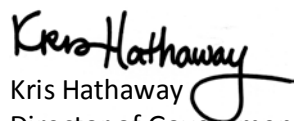
“the representative and recognized resource of the dental benefits industry”



There is no single accepted credentialing form accepted and utilized across the dental benefits industry. Due to ongoing discussions with the dental provider community, NADP is working with all stakeholders to initiate, streamline and standardize a dental credentialing form. Currently, NADP is directing a pilot project utilizing a form with participating companies from across the industry and the provider community from Dental Support Organizations (DSOs). Testing is ongoing and we are excited about the long-term prospect of building consensus around this common issue within the industry. If in the future, the Department considers the development of a credentialing form for dental necessary, we would be happy to share the results of this project and insights from the process.

NADP greatly appreciates your time and attention to our concerns. In addition to these comments, we have also attached our New Mexico Dental State Fact Sheet for your review. Please contact me with any questions regarding these comments at khathaway@nadp.org or 972.458.6998 x. 111. Again, thank you for your consideration.

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 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.

National Association of Dental Plans

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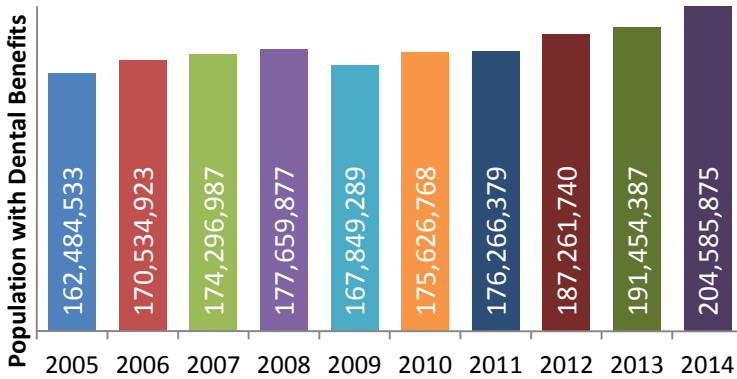
New Mexico

Dental Benefits Fact Sheet



National Enrollment Trends

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



Source: 2015 NADP Dental Benefits Report on Enrollment

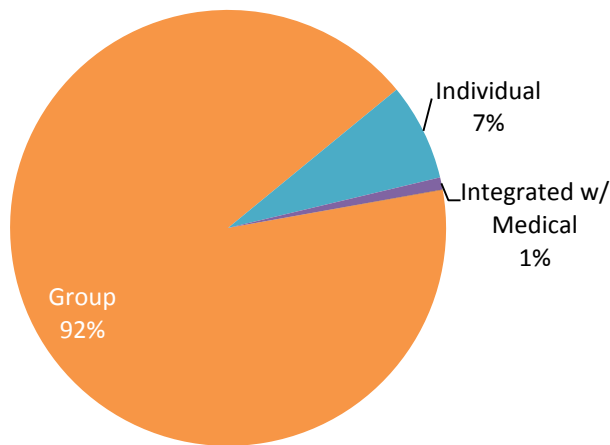
Dental Enrollment

An estimated 1,021,609 or 49% of the population have dental benefits in New Mexico.

Plan Type	Enrollment
Private Plans	
DHMO	9,540
DPPO	755,394
Indemnity	43,333
Other Private	21,774
Public Plans	
Medicaid/CHIP ⁶⁵	191,291

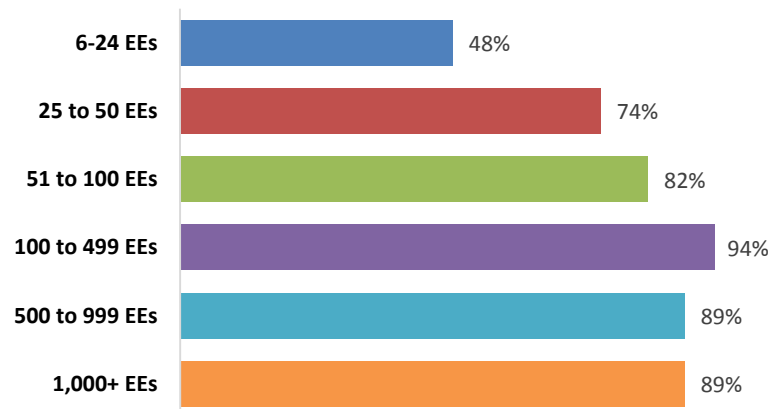
Source: Data from the Centers for Medicare and Medicaid Services and 2015 NADP Dental Benefits Report on Enrollment

Sources of Private Dental Coverage



Source: 2015 NADP Dental Benefits Report on Enrollment

Employers Offering Dental Benefits by Employer Size



Source: 2015 NADP Survey of Employers

Premium Facts

New Mexico	DHMO	DPPO	Indemnity
Small Group	--	\$37.61	\$39.47
Large Group	--	\$29.77	--
Individual	--	--	--
Nat'l All Group Avg	\$17.01	\$31.69	\$36.13

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

Distribution of Commercial Benefits: State vs National

	DHMO	DPPO	Indemnity	Other
New Mexico	0.9%	73.9%	4.2%	2.1%
National	7.9%	78.9%	6.8%	6.4%

Source: 2015 NADP Dental Benefits Report on Enrollment

New Mexico Dental Benefits Fact Sheet

Workforce NADP Members

The federal standard for an adequate supply of dentists is 3.33 practicing dentists per 10,000 population.⁶⁶

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

Network Type	Total Dentist	General Dentists	Pediatric Dentists	Specialists	Per 10,000
DHMO	66	38	2	26	0.32
DPPO	1,357	1,125	50	182	6.51
Discount	706	591	25	90	3.39

Source: 2015 NADP/DDPA Joint Dental Benefits Report on Network Statistics and U.S. Department of Health and Human Services

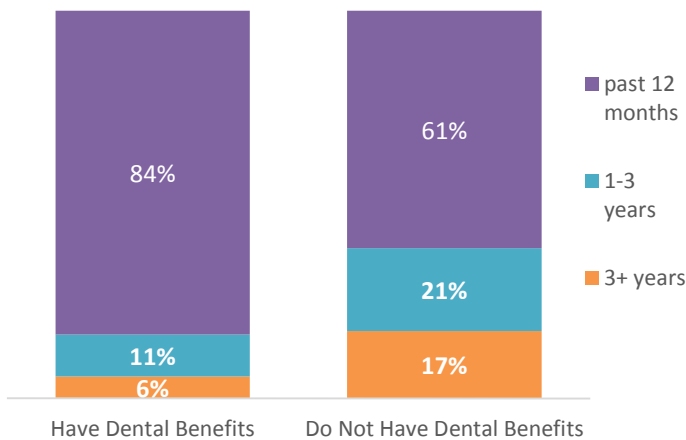
Plan Types Offered by NADP Members



Source: 2015 NADP Membership Directory

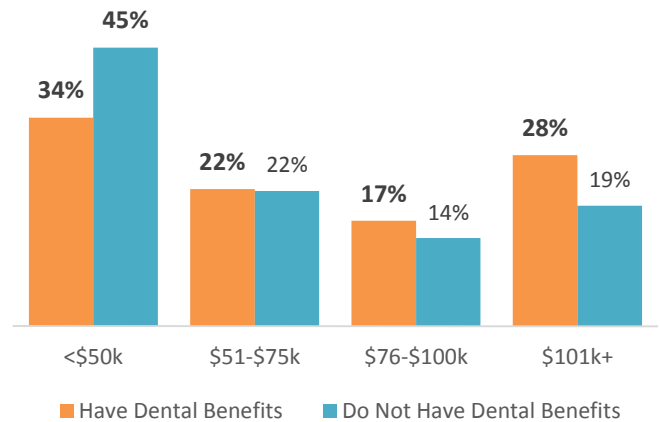
Dental Benefits Impact Consumer Behavior Who Has Dental Benefits

When was your last visit to the dentist?



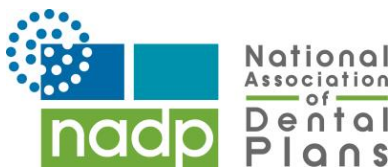
Source: 2015 NADP Survey of Consumers

Consumers with and without Dental Benefits by Household Income



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.