



May 15, 2015

Louis Gutierrez, Executive Director  
Commonwealth Health Insurance Connector Authority  
100 City Hall Plaza, 6<sup>th</sup> Floor  
Boston, MA 02108  
Sent via email

Dear Mr. Gutierrez:

The National Association of Dental Plans (NADP) is writing in response to the March 13 Request for Responses (RFR) for Stand-Alone Dental Plans (SADP). The RFR requires issuers that have participated on the Exchange for at least two years to submit a Quality Improvement Strategy (QIS) implementation plan. NADP would like to provide background on the state of quality-related initiatives in the dental industry and to offer our expertise as a resource to the Connector moving forward.

CMS has exempted dental issuers from submission of the QIS for 2016 in the Notice of Benefit and Payment Parameters, as quality measures are just emerging within the commercial dental benefits industry. Within Medicaid programs, CMS works closely with the Dental Quality Alliance (DQA) and they are just now initiating dental quality measures within public programs.

- As the Massachusetts Connector collects QIS's from dental carriers to better understand various perspectives, NADP strongly recommends any quality components to be based on DQA measures and initiatives. In addition, dental carriers, providers and regulators will need time and flexibility as this new and emerging trend is incorporated appropriately within the oral health community.

**Background:** At the request of CMS in 2008, the American Dental Association (ADA) was asked to take the lead in establishing the 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 Children's Health Insurance Programs (CHIP).

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



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 also 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. Recently, five DQA measures have been endorsed by the National Quality Forum (NQF) after pediatric oral health performance measures were tested using administrative data from Florida and Texas Medicaid and CHIP programs. NQF endorsement is considered the gold standard for measuring healthcare quality and is required by CMS for use in its programs.

The five NQF-endorsed measures evaluate dental service utilization, oral evaluations, topical fluoride intensity and sealant use in children at elevated caries risk. To find more information on the NQF-endorsed measures, please visit NQF's [Health & Wellbeing website](#).

CMS continues its involvement in and recognition of DQA measure development. Most recently, CMS included the DQA measure of dental sealants for 6-9 year old children at elevated caries risk in its 2015 Core Set of Health Care Quality Measures for Children Enrolled in Medicaid and CHIP (Child Core Set). The Core Set is a voluntary reporting system and set of tools states can use to monitor and improve quality of care provided to Medicaid and CHIP enrollees.

DQA and its Research and Development Committee will continue to develop, test and implement new measures which are both appropriate and valid for the dental profession and dental benefits industry, and NADP looks forward to being a proactive partner as the DQA works to advance new and innovative tools to review oral health quality measures. As the Connector explores quality improvement strategies within oral health, NADP strongly encourages the sole utilization of DQA and flexibility amid guidance to encourage and support innovation.

NADP greatly appreciates the opportunity to share our views, and we look forward to future discussions with the Connector. Please contact me with any questions regarding these comments at [khathaway@nadp.org](mailto:khathaway@nadp.org) or 972.458.6998 x111.

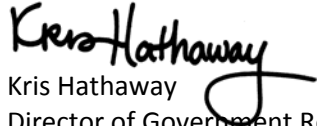
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Sincerely,

  
Kris Hathaway  
Director of Government Relations

CC: Mr. Michael Norton  
Senior Manager of External Affairs and Carrier 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 92 percent of the 191 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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