



May 28, 2014

Maryland Health Benefit Exchange “Maryland Health Connection”
Carolyn Quattrocki, Interim Executive Director
Joshua M. Sharstein, M.D., Chairman of the Board
750 East Pratt St., 16th Floor
Baltimore, MD 21202

Re: Maryland Utilization of Connecticut Source Code

Dear Ms. Quattrocki and Dr. Sharstein;

The National Association of Dental Plans (NADP) has long applauded Maryland’s attention to the oral health community and the dental needs of Maryland’s population. Therefore, NADP is concerned with the Maryland Health Benefit Exchange’s (MHBE) recent decision which is contrary to the law and reverses the state’s progression on oral health.

From our understanding, due to IT and connectivity issues, the MHBE has announced they would be purchasing Connecticut’s Marketplace source code. Access Health CT had been marketing their “Exchange in the Box” to state Exchanges which have been struggling through enrollment. It was shortly after this announcement that HHS stated they own any source code funded by the Exchange grants and that states could request various source codes from HHS. It is also our understanding MHBE has hired Deloitte to implement the new source code.

Utilizing Connecticut’s source code is problematic as it does not include the allowance for separate dental plans to be offered on an Exchange. Connecticut announced in 2013 that they had dental plans wanting to offer dental policies on their Exchange, but due to IT reasons they would not be able to offer separate dental plans until 2015. Connecticut is currently altering their source code to allow for the purchase of separate dental policies for 2015; however, that is not part of the source code MHBE is implementing. Connecticut is the only state with the one source code in 2014 which required medical policies to have pediatric dental benefits embedded and it seems unfathomable this particular source code is the one Maryland chose.

Deloitte also worked on Kentucky, Rhode Island and Washington D.C.’s Exchanges, all which offer separate purchasing of dental. If HHS oversees source code, **NADP is inquiring why MHBE does not use one of these state’s source code.**

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12700 Park Central Drive • Suite 400 • Dallas, Texas 75251

972.458.6998 • 972.458.2258 [fax]

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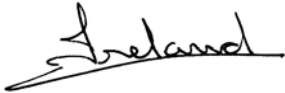
Legal Requirements: For Maryland to be in compliance with the ACA¹, HHS Guidance², and its own state Marketplace law³, MHBE must allow medical carriers the opportunity to offer Qualified Health Plans (QHPs) without embedded pediatric dental benefits when stand-alone dental plans are certified to offer on the Exchange beginning in 2015.

Currently, Maryland has four dental carriers offering policies on the Maryland Health Connection. To move down a path that does not allow for separate dental plans, means the dental coverage consumers purchased for this year will not be renewable. In addition, this will mean minimal choice for consumers as they will make their benefit choices based on the medical plan they want and not on the dental coverage they would prefer. While consumers may want to purchase a medical plan with an embedded dental benefit, they should also have the choice of purchasing their benefits separately, as 99% of consumers do today.

- ❖ **NADP Recommendation:** The MHBE should utilize a state's source code which allows for separate dental plans, or utilize current Connecticut source code which is allowing for separate dental. As the Maryland Health Connection transitions during 2015, NADP encourages MHBE to reinitiate the dental committee so that temporary workarounds, such as dental carrier links and renewals issues, can be addressed promptly and succinctly.

NADP works closely with the Maryland Alliance of Dental Plans, led by Kimberly Robinson, as we represent the same Maryland dental plans. We jointly look forward to future discussions on the inclusion of dental choices within the Maryland Health Connection. We also have attached our member list as well as dental fact sheet on Maryland. Please contact Kimberly Robinson at krobinson@fblaw.com or (410) 659-7751 or my Director of Government Relations, Kris Hathaway, with any questions regarding these comments at khathaway@nadp.org or 972 458-6998x111. Thank you for your time and consideration.

Sincerely,



Evelyn F. Ireland, CAE
Executive Director, National Association of Dental Plans

¹ Marketplaces to allow a QHP without pediatric dental coverage when a separate dental policy meeting EHB requirements is offered (42 U.S.C. sec. 18022(b)(4)(F) / ACA Sec 1302(b)(4)(F).

² Marketplaces to allow stand-alone dental plans to offer pediatric dental EHB products either independently from a QHP or in conjunction with a QHP issuer, but cannot limit participation of stand-alone dental plans to only one of those options (77 Fed Reg. 18411, March 27, 2012).

³ Md. Insurance Code § 31-115(c).





Maryland

Dental Benefits Fact Sheet

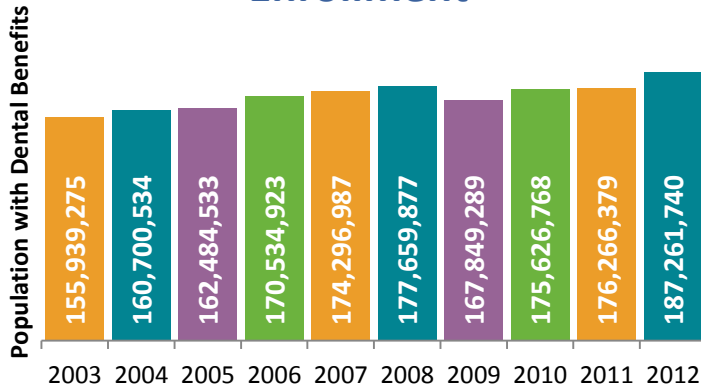


National Enrollment Trends

State Enrollment

An estimated 3,217,635 people are enrolled in a private dental plan from Maryland.

Enrollment



Private Plan Enrollment

Plan Type	Enrollment
DHMO	342,039
DPPO	2,509,089
Indemnity	282,621
Other Private	83,884

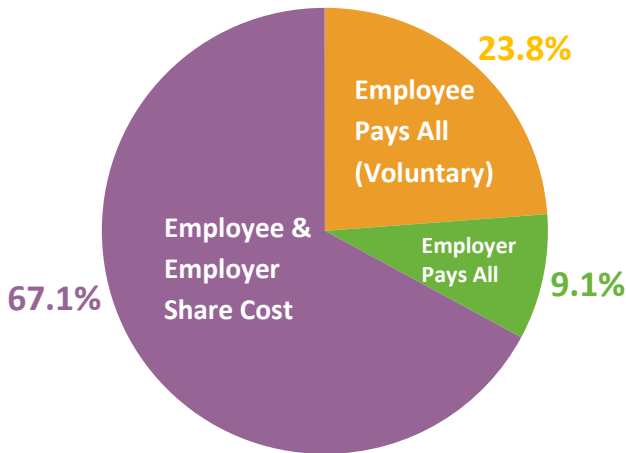
Public Plan Enrollment

Medicaid/CHIP ¹	869,966
Other Public ²	848,797

Source: 2013 NADP/DDPA Joint Dental Benefits Report on Enrollment

Source: 2013 NADP/DDPA Joint Dental Benefits Report on Enrollment

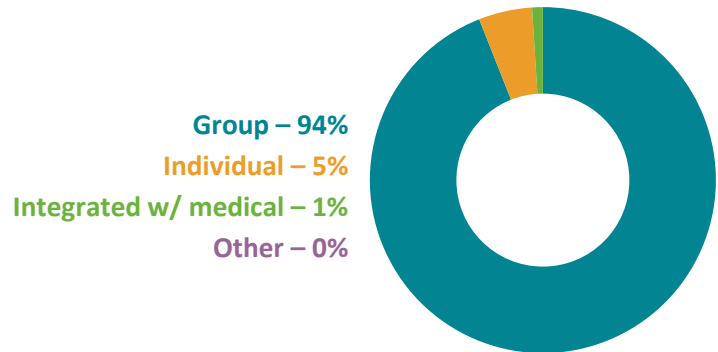
Group Policy Funding



Distribution of Commercial Benefits: State vs National

	DHMO	DPPO	Indemnity	Other
Maryland	10.6%	78.0%	8.8%	2.6%
National	8.4%	77.2%	9.0%	5.4%

Sources of Private Dental Coverage



Source: 2013 NADP/DDPA Joint Dental Benefits Report on Enrollment

Source: 2013 NADP/DDPA Joint Dental Benefits Report on Enrollment

Premium Facts

Nationally, premium increases ranged for existing group coverage from 0.2% for DHMO products to 1.5% for DPPO products

Average monthly dental premium per member per month in Maryland:
DPPO: \$31.32

¹ Data from the Center for Medicare and Medicaid Services. If 0, then CMS data is not available.

² "Other Public": Includes enrollment in federal and state programs not part of Medicaid

Source: NADP 2013 Dental Benefits Report: Premium and Benefit Utilization Trends, Dec 2013



Maryland 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.²

According to the American Dental Association 3,930 dentists are actively practicing in Maryland or 6.67 dentists per 10,000 population.³

Network Type	Total Dentists	General Dentists	Pediatric Dentists	Specialists
DHMO	773	449	67	93
DPPO	4,173	3,094	155	294
Discount	3,225	2,430	122	227

Plan Types Offered by NADP Members



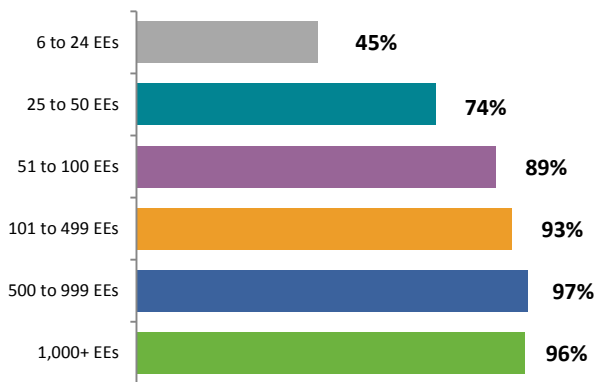
Source: 2013 NADP/DDPA Joint Dental Benefits Report on Network Statistics

Source: 2013 NADP Membership Directory

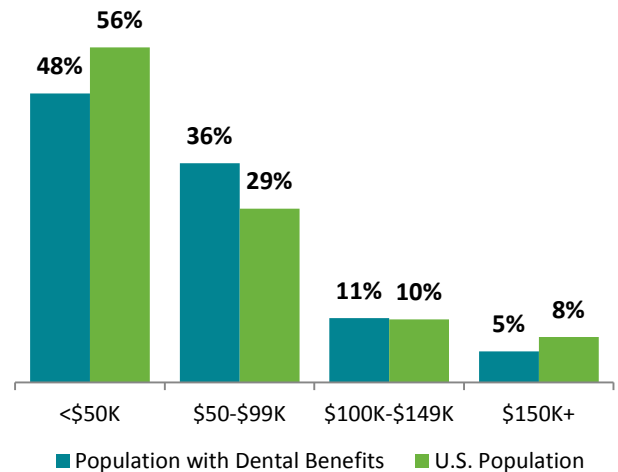
Where do Consumers Get Dental Benefits

Who Has Dental Benefits

Employers Offering Dental Benefits by Employer Size



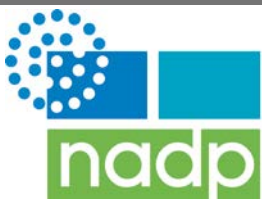
Consumers with Dental Benefits by Household Income compared to General Population



Source: 2013 NADP Purchaser Behavior Survey

Source: 2013 NADP Survey of Consumers

About



National Association of Dental Plans

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 approximately 90 percent of the 187 million Americans with dental benefits.

² U.S. Department of Health and Human Services

³ American Dental Association

NADP MEMBERS & SUBSIDIARIES

Last Updated: February 2014



Advantage Dental Plan

Aetna Dental

Altus Dental Ins Co

Delta Dental of RI

American Dental Professional Svcs

American Dental Partners

American Enterprise Group

AmeriPlan Corporation

Ameritas Life Ins Corp.

First Ameritas Life Ins Corp.

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

Avesis Third Party Admin. Inc.

Best Life and Health Ins Co

Blue Cross Blue Shield of AZ

Blue Cross Blue Shield of MA

Blue Shield of Arkansas

Blue Shield of Hawaii

Blue Cross of Florida

Florida Combined Life Ins Co

USAbile Life

Life & Specialty Ventures

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 SC

Blue Shield of CA

CareFirst BlueCross BlueShield

The Dental Network, Inc.

CAREINGTON INTERNATIONAL

The CDI Group

Cigna Dental & Vision Care

Great West Healthcare

Citizens Security Life Ins Co

Companion Life Ins Co

Total Dental Administrators

Dedicated Dental / Interdent

Delta Dental of AZ

Delta Dental of CA, NY, PA & Affiliates

Delta Dental of AK

Delta Dental of AL

Delta Dental of DC

Delta Dental of DE

Delta Dental of GA

Delta Dental of LA

Delta Dental of MD

Delta Dental of MS

Delta Dental of MT

Delta Dental of NV

Delta Dental of TX

Delta Dental of UT

Delta Dental of VT

Delta Dental of WV

Denti-Cal

Delta Dental of IA

Delta Dental of MI, OH, IN

Delta Care

Delta Dental of AR

Delta Dental of TN

Renaissance Dental Network

Renaissance Health Inc. Company of NY

Renaissance Life & Health Ins. Company

Delta Dental of MO

Advantica Benefits

Delta Dental of WA

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

GEHA

PPO USA a Division of GEHA

Guardian Life Ins Co of America

Berkshire Life Ins Co of America
First Commonwealth, Inc.
Managed Dental Care

Health Resources, Inc.

HealthPartners, Inc

Central Minnesota Group Health Inc
Group Health Plan Inc
HealthPartners Administrators, Inc.
Midwest Assurance Company

Horizon BCBS NJ

Humana Specialty Benefits

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

Lincoln Financial Group

MetLife

SafeGuard Dental and Vision
SafeGuard Health Plans, Inc
SafeGuard Health Enterprises

Mutual of Omaha

National Guardian Life Ins Co

Nevada Dental Benefits

Nippon Life Ins Co of America

Northeast Delta Dental

Pacific Source Health Plans

Pan American Life

Premera Blue Cross

Blue Cross of WA and AK
Lifewise Assurance
Lifewise Health Plan of OR
Premera Blue Cross Blue Shield of AK

Premier Access Dental & Vision

Principal Financial Group

Diversified Dental Svcs
Employers Dental Svcs, Inc.

Reserve National

Risk Solutions Resources

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

WellPoint Dental Svcs

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

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
Dental Associates
Dental Care Alliance
DentalOne Partners
Great Expression Dental Centers
Kool Smiles
Heartland Dental Care
Pacific Dental Services
Park Dental
Smile Brands Inc.
West Coast Dental Services*

Supporting Organizations

*Aldera
BeneCare
Colonial Life & Accident Ins Co
Davis Vision
Dentistat, Inc. & go2dental.com, Inc.
Health Solutions Plus
Healthscape Advisors
McKinsey and Company
Milliman Inc.
P & R Dental Strategies, Inc.
Pacific Resources
Qualbe Marketing
Revolv (formerly Corvesta)
Santech Solutions, Inc.
Secure EDI
Spencer Stuart
Stratose
Tesia Clearinghouse
The Ignition Group
The Premier Dental Group, Inc.
Towers Watson
West Monroe Partners
Wonderbox Technologies*

Individual Members

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Dr. D.E. FitzGerald
Lynda Hunnicutt
Dr. Steven Keller
James Kingston
Dr. David Klock, Ph.D.
Dolores Kordek
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