



February 28, 2014

Mr. Adam Plain
Nevada Division of Insurance
1818 E. College Parkway, Suite 103
Carson City, NV 89706
Submitted via email to aplain@doi.nv.gov

Dear Mr. Plain,

The National Association of Dental Plans (NADP) is responding with written comments to the Division of Insurance (DOI) Issue Brief on Network Adequacy. In addition to recommendations outlined here, we would like to offer NADP as a resource to the Department moving forward, with background information, network data and reports on various topics.

As background, there is no single accepted network adequacy standard within an NAIC Model, state statute, or commercial dental benefit industry. While large employers typically specify network requirements for their dental benefit programs, these are highly specific to the employer and geographic area of operation. As the DOI develops network adequacy standards, we recommend the careful consideration of key differences in dental and medical plans:

- Nationwide, over 80 percent of dentists are general dentists in contrast to about 12.3 percent of physicians who focus on primary care. There are approximately 56 dentists in active practice per 100,000 people in the U.S. vs. 312 physicians per 100,000. As 85 percent of services are delivered by a general dentist in an office setting, immediate and local access to dental specialists is less critical than it is for medical specialists.
- The dental benefits industry comprises primarily of DPPO products, i.e., dental preferred provider plans, wherein customers have the freedom to choose from a variety of dentists both in and out-of-network. Specifically, about 69 percent of separate dental policies are DPPO. These dental plans have broad provider networks in which about two-thirds of privately practicing dentists participate nationally. Given the relative network freedom present in the vast majority of dental insurance products today, establishing network adequacy standards to qualify dental plans may be less critical.
- To our knowledge, dental plans have not limited networks that support Exchange products and consumers should not experience any deviation in provider access from commercial products.

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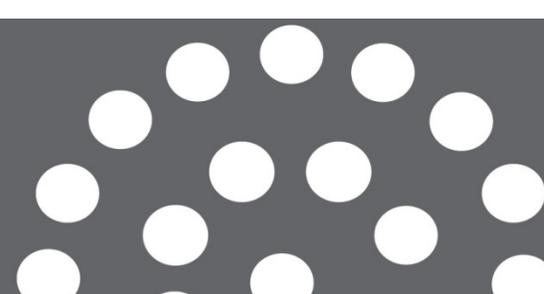
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NADP is not aware of any concerns raised by employers related to dental network adequacy issues. Due to the factors bulleted above, as well as the current instability of the market due to the Affordable Care Act, NADP recommends not applying standards to dental networks until the need is made apparent by employers or individuals to the DOI.

NADP State Fact Sheets and Network Statistics Report provide similar background information specifically for Nevada, and we are happy to provide these resource materials upon request.

NADP greatly appreciates the opportunity to share our views, and we look forward to future discussions with the DOI. 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 dental plans and dental indemnity products. NADP's members provide dental benefits to approximately 90 percent of the 187 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.

