



March 21, 2014

The Honorable John G. Franchini
Superintendent of Insurance
New Mexico Office of Superintendent of Insurance
PO Box 1689
Santa Fe, NM 87504-1689
Sent via email

Dear Superintendent Franchini,

The National Association of Dental Plans (NADP) is writing regarding the 2015 plan year form and rate filing deadlines as established by the New Mexico Office of Superintendent of Insurance (OSI). According to the OSI Healthcare Reform website for carriers¹, stand-alone dental plan (SADP) form and rate filings are due March 31 to be offered on the Exchange. Due to the time necessary to implement several new regulatory standards for these plans, we urge the OSI to consider extending this deadline to April 30, 2014. Additionally, we ask that the OSI clarify if SADPs offered on the Small Business Health Options Program (SHOP) are to follow the April 30 deadline established for Qualified Health Plans (QHPs) on the SHOP.

Recent regulations finalized by the Department of Health and Human Services (HHS) in its Notice of Benefit and Payment Parameters for 2015² modified several standards applicable to dental plans that will require significant changes to all dental offerings on Exchanges. In particular, the lowering of the separate out-of-pocket maximum required for SADPs from \$700 for a single child and \$1,400 for two more children in 2014 to \$350 and \$700 respectively in 2015 will require carriers to adjust various components of benefit plans in order to maintain required Actuarial Value (AV) levels and mitigate premium increases. As HHS published the Final Rule on March 11, a form and rate filing deadline of March 31 would allow less than a month to implement the required standards.

We urge the OSI to consider extending the deadline to allow carriers sufficient time to build valuable dental plans for New Mexico children and families.

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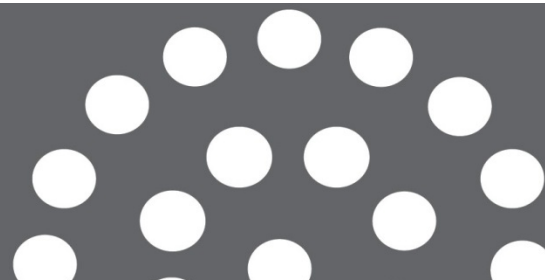
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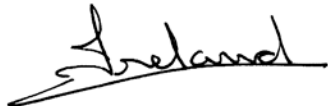
¹ "Healthcare Reform: For Carriers Submitting Qualified Health Plans for Review," NM OSI. 20 March 2014. <http://www.osi.state.nm.us/healthcare-reform/index.html>

² "Patient Protection and Affordable Care Act; HHS Notice of Benefit and Payment Parameters for 2015." 79 Federal Register 47 (11 March 2014).



NADP greatly appreciates your time and attention to our concerns, and we look forward to future discussions on these critical issues. Please contact myself or NADP's Director of Government Relations, Kris Hathaway at khathaway@nadp.org or 972-458-6998x111 with any questions or concerns. Again, thank you for your consideration.

Sincerely,



Evelyn F. Ireland, CAE
Executive Director

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.

