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of Dental Plans

August 16, 2023

Rules Coordinator  
Office of the Insurance Commissioner  
302 Sid Snyder Ave., SW  
Olympia, WA 98504

Submitted via email to: [rulescoordinator@oic.wa.gov](mailto:rulescoordinator@oic.wa.gov)

## RE: Notice of rulemaking on health care benefit manager registration ([R 2023-06](#) and [R 2023-07](#))

To Whom it May Concern,

On behalf of the National Association of Dental Plans (NADP) we thank you for the opportunity to comment on rulemaking on Health Care Benefit Managers (HCBMs) as a result of SB 5066. In particular, we want to request that any regulation minimizes duplicative filing requirements for dental networks in Washington.

A dental network typically facilitates the expansion of dental coverage for an insurance carrier by providing credentialing, contracting, education, and outreach functions, but not making decisions on benefits or claims management. While dental networks are regulated as HCBMs in Washington, their contracts with providers are also filed under the requirements of RCW 48.43.730 which governs health carriers. Therefore, the requirement of SB 5066 that HCBMs report those same contracts with health carriers could create significant confusion among dental networks, carriers and OIC over which reports are required and lead to the duplication of information over several forms.

NADP is concerned that the potential administrative spending increases resulting from SB 5066 could harm access to dental coverage in Washington through higher costs. In implementing SB 5066, NADP recommends that rulemaking address the unique nature of dental networks and minimize the substantial administrative burdens that a rule could impose on dental networks, carriers and OIC. NADP intends to provide recommendations on the

### National Association of Dental Plans

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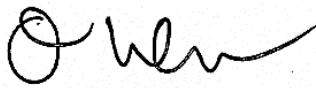


requirements of future contract filings for dental networks as well as other issues.

Furthermore, NADP is concerned that as of now SB 5066 would require dental networks to file their contracts with carriers by September 21, potentially without any rules in place. NADP requests that OIC provide clear guidance that dental networks should not have to file their contracts with carriers until the rules for such filings are finalized and effective.

Questions regarding our comments should be directed to Owen Urech, Director of Government Relations, at [ourech@nadp.org](mailto:ourech@nadp.org) or 972-458-6998 x108.

Sincerely,



Owen Urech  
Director of Government Relations

**NADP Description:**

NADP is the largest non-profit trade association focused exclusively on the dental benefits industry. NADP's members provide dental HMO, dental PPO, dental Indemnity and discount dental products to 200 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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