

Dear Mr. Plain:

Please find attached the comment letter and supporting material previously submitted to the Nevada Silver State Health Exchange by the Nevada Dental Association concerning the essential pediatric dental benefit.

I understand that your department is reviewing comments submitted to the SSHIX Board. However, for the record, we wanted to reaffirm our position, as the Division of Insurance conducts its public hearings on the topic.

In sum, the Nevada Dental Association supports adoption of a comprehensive dental benefit, and we request that the Division of Insurance consider the following:

- \* choosing the Children's Health Insurance Program (CHIP) benefit as the benchmark for the pediatric dental benefit, considering the specific peculiarities of the dental insurance market, and the number of persons covered under stand-alone dental plans;

- \* consider issues and scenarios under which there may be crossover areas in which clinical dental and medical services are provided, and ensure that the responsibility for coverage and reimbursement for interrelated services, such as anesthesia, is specifically delineated in and between Qualified Health Plans, and any stand-alone dental plans in the Exchange;

- \* allow or recommend that insurers participating in the Exchange to offer adult-specific coverage in conjunction with the pediatric dental benefit, to allow parents or caregivers to obtain care from the same provider treating their child, as well as allow the opportunity to purchase supplemental coverage for any services not covered in the essential health benefit; and

- \* reinforce public awareness that the pediatric dental benefit is an essential health benefit, eligible for a federal subsidy for that reason, through the business solution vendor's web portal and through Navigators who will guide Nevadans in accessing the Exchange.

Earlier this year, the NDA testified before the Board regarding the points above, and in strong favor of offering the pediatric dental benefit through a stand-alone dental plan, as we believe this would cause

minimal market disruption, and allow for the maximum amount of consumer choice.

We commend you and Commissioner Kipper on your public outreach on this very important topic.

Thank you for your consideration. Please do not hesitate to contact me, or the NDA Executive

Director, Dr. Robert Talley at email: Robert.talleydds@nvda.org, or phone: (702) 255-4211, if we can be of any further assistance to the Division.

Very truly yours,

Joanna Jacob

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