

June 12, 2015

SENT VIA EMAIL

Nevada Division of Insurance  
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Carson City, NV 89706  
[ydeavila@nv.doi.gov](mailto:ydeavila@nv.doi.gov)

RE: Nevada Essential Health Benefits Benchmark Plan for Plan Year 2017

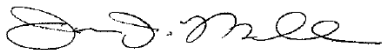
Dear Commissioner Kipper:

I am writing on behalf of Delta Dental Insurance Company (“DDIC”) regarding the recent discussion on the 2017 essential health benefits benchmark plan for the Nevada Health Link (“the Exchange”). We are pleased to offer some specific comments regarding the unique considerations of the essential pediatric dental benefit in the process of setting the Essential Health Benefits Package (“EHBP”).

In our review of the Comparison of Potential 2017 EHB Benchmark Plans for Nevada, we note that, unlike when the previous benchmark was picked in 2012, four of the ten benchmark plans identified contain some dental benefits, although the information provided in the chart is limited to a dental check-up for children. Without further transparency, therefore, we cannot determine if these embedded dental benefits are reflective of the Nevada CHIP program or not. As such, we recommend that a careful analysis of the scope of dental benefits for children, where they are included in these four plans, be sufficiently conducted to ensure benefits that are substantially similar to CHIP. If not, the Nevada Exchange should look to the default benchmark plans (CHIP vs. FEDVIP) as instructed by the HHS essential health benefits bulletin of April 8, 2015 to supplement the essential pediatric dental benefit in accordance with 45 CFR 156.110(b).

If you have any questions, please do not hesitate to call me at (415) 972-8418. We appreciate the opportunity to submit comments on this important topic.

Sincerely,



James Mullen  
Manager, Public & Government Affairs  
Delta Dental of California