

**America's Health
Insurance Plans**

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NV DOI-Legal
Dec. 6, 2016

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Barbara Richardson
Commissioner, Nevada Division of Insurance
1818 E. College Parkway, Suite 103
Carson City, NV 89706

Re: Proposed Rules – Dental Claims Under a Policy of Health Insurance (R119-16)

Dear Commissioner Richardson,

I write today on behalf of America's Health Insurance Plans (AHIP) to provide comments on the November 28, 2016 version of the Nevada Division of Insurance's proposed amendments to the regulations on dental claims under a policy of health insurance.

America's Health Insurance Plans (AHIP) is the national trade association representing the health insurance community. AHIP's members provide health and supplemental benefits through employer-sponsored coverage, the individual insurance market, and public programs such as Medicare and Medicaid. AHIP advocates for public policies that expand access to affordable health care coverage to all Americans through a competitive marketplace that fosters choice, quality, and innovation.

We write today to express a concern with the Division's adoption in NAC 686A.288(2)(c) of the American Dental Association's Code on Dental Procedures and Nomenclature (CDT Code) set forth in the *CDT 2016: Dental Procedure Codes*. The CDT Code is subject to annual review and revision by the ADA's Council on Dental Benefit Programs. The Council has already adopted changes for inclusion in CDT 2017, which will become effective on January 1, 2017. Because the CDT Code changes annually, these regulations will be out of date as soon as they are adopted. We therefore suggest the Division use more general language to adopt "the most current version of the Code on Dental Procedures and Nomenclature" rather than the 2016 version specifically.

We appreciate the opportunity to provide comments and look forward to continued discussions on this matter. If you have any questions, please do not hesitate to contact me at smoore@ahip.org or 916-996-2376.

Sincerely,

A handwritten signature in black ink that reads "Sunshine Moore". The signature is written in a cursive, flowing style.

Sunshine Moore
Regional Director