

May 29, 2015

Mr. Andy Slavitt
Acting Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-10558
Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

**Re: Information Collection for Machine Readable Data for Provider Network and Prescription Formulary
Content for FFM QHPs (CMS-10558)**

Dear Mr. Slavitt:

I am writing on behalf of Delta Dental Plans Association (DDPA) in response to the information to offer comments in response to the Department of Health and Human Services, Centers for Medicare and Medicaid Services (CMS) Information Request related to the machine readable data for provider network and prescription formulary, published in the *Federal Register* (80 FR 16687) on March 30, 2015, and the subsequent detailed information posted on the CMS Paperwork Reduction Act (PRA) website.

DDPA is the nation's largest, most experienced dental benefits system. Since 1954, DDPA has worked to improve oral health in the U.S. by emphasizing preventive care, and making quality, cost-effective dental benefits affordable to a wide variety of large and small employers and groups, and individuals, including participation in state Medicaid and Children's Health Insurance Program (CHIP) dental plan arrangements.

DDPA provides a nationwide system of dental health service plans, offers custom programs and reporting systems that provide individuals, employees, and state Medicaid and CHIP participants with quality, cost-effective dental benefit programs and services. Our nationwide network of 39 companies and 151,000 dentists, serves more than 62 million Americans in over 114,000 group plans across the nation.

DDPA is committed to the long term viability and success of the Marketplaces. Our member companies are offering stand-alone dental plans (SADP) on public Marketplaces in 44 states. As of December of 2014, we estimate that we had enrolled 282,706 individuals in SADPs through the public Marketplaces.

Timing

We recommend that CMS finalize the PRA requirements as soon as possible so our member companies can produce their files prior to the start of the 2016 open enrollment. The requirement for machine readable files set forth in the final 2016 Letter to Issuers in the Federally-facilitated Marketplaces established a fairly condensed timeframe for the certification of plans. While the Developer Document did include information on the schema, plan technical experts are in need of additional information on how various APIs will connect to plan websites and pull down the data. Also, time is needed for testing of this process. We recommend that the final information be released as soon as the PRA is finalized and adequate time be provided for testing.

JSON Standard

We support the CMS proposal that all information be described in the JSON file format. DDPA is prepared to utilize this file format for its provider directories.

Provider File

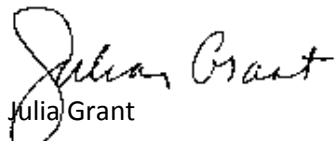
We support CMS' proposed provider file schema. DDPA supports transparency, and the proposed provider schema will allow consumers to view the dental providers available prior to purchasing a plan. Reporting on dental providers in this framework should be required of both SADPs and major medical plans with "embedded" dental benefits so that consumers are fully aware of their access to providers under all plans offered in the marketplaces. We only recommend that CMS consider the unique characteristics of dental providers when finalizing these fields. For example, "facility type" for a dental provider may be different than for other types of major medical providers. Specialty type is also unique for dental providers.¹

Preview

We recommend plans be given the opportunity to review how their JSON data will appear on HealthCare.gov. Just as our member companies are given the opportunity to correct errors in how their plans appear on Plan Preview on HealthCare.gov, issuers should be given the opportunity to review how their data is going to look on HealthCare.gov after it has been uploaded. We recommend that plans be given the ability to preview how their data is displayed prior to November 1st so that they can make any necessary corrections.

Thank you for the opportunity to comment on these requirements necessary to providing additional transparency to the consumer shopping experience on HealthCare.gov. As we noted, please provide us with plenty of time to ensure that this process can operate smoothly this year by building in plenty of time for testing and feedback from issuers.

Sincerely,



Julia Grant
Vice President Government Relations
Delta Dental Plans Association

¹ DDPA uses the American Dental Association definitions of dental specialist categories of Dental Public Health, Endodontics, Oral and Maxillofacial Pathology, Oral and Maxillofacial Radiology, Oral and Maxillofacial Surgery, Orthodontics and Dentofacial Orthopedics, Pediatric Dentistry, Periodontics, and Prosthodontics found at <http://www.ada.org/en/education-careers/careers-in-dentistry/dental-specialties/specialty-definitions>.