



April 1, 2016

Dave Jones, Commissioner
California Department of Insurance
300 Capitol Mall, Suite 1700
Sacramento, CA 95814
Via email: Kayte.Fisher@insurance.ca.gov

Dear Commissioner Jones,

Thank you for the opportunity to provide comment on the proposed merger between Anthem and Cigna. The California Dental Association (CDA) represents over 26,000 California dentists with a mission of commitment to the success of its members in service to their patients and the public. Our member dentists contract as participating providers with various dental benefit plans, including Anthem and Cigna.

CDA raises the following issues for your consideration as you evaluate the impact of this proposed merger on California consumers and the healthcare environment statewide:

Network Adequacy

Consumers need to be assured of improved access to dental care through an accurate, verifiable, and comprehensive provider network. While the recent passage of CDA-supported SB 137 (Hernandez – Chap. 649, Stats. of 2015) will take unprecedented steps to ensure that health plans and providers are timely in updating their network plan directories, further evaluation is required to ensure that patients' ability to access both general and specialty providers in a timely and reasonable manner, continues to improve as a result of these plan mergers.

Transparency

It remains essential that consumers understand where and how their dental premium dollars are being spent. To ensure consumers have access to that critical information, CDA sponsored legislation in 2014, AB 1962 (Skinner – Chap. 567, Stats. of 2014), which creates standardized requirements for dental plans to annually disclose to state regulators and the public how they spend patient premium dollars. We believe that dental MLR reporting will provide consumers with enhanced knowledge of the dental benefit policies being sold in California and will assist consumers with avoiding purchasing dental plans offering illusory benefits. To this end, we want to ensure that attention is paid to the cost-sharing data reporting requirements currently placed on these plans, and not allow for relaxed or delayed reporting due to administrative demands of the proposed merger.

Accountability

Should this merger be approved, CDA asks that the department include additional clear and enforceable conditions to ensure that Anthem's stated goals of improved affordability, efficiency and value are realized for California consumers across all product lines. The conditions should also require that accurate and timely information is provided to consumers and providers to mitigate disruption of care. With fewer choices on the market for specialty care plans, such as dental insurance, Anthem's accountability to their members in achieving their stated goals will be an even larger factor in the confidence of consumers in California's health care system going forward.

On behalf of our members, I would like to express our appreciation for the care and consideration you and your department have demonstrated in evaluating the impacts of this proposed merger on California consumers and the healthcare environment statewide.

Sincerely,

A handwritten signature in black ink, appearing to read "Megan Allred". The signature is fluid and cursive, with a long horizontal stroke at the end.

Megan Allred
Legislative Advocate