

May 5, 2020

Insurance Commissioner Mike Kreidler
Washington State Office of the Insurance Commissioner
5000 Capitol Blvd SE
Olympia, WA 98512

Re: Insurance Modifications in Response to COVID-19

Sent via e-mail only

Dear Insurance Commissioner Kreidler:

The Washington State Dental Association (WSDA) and our 4,400 members would like to thank you for your leadership during these difficult times as well as your continued advocacy on behalf of our state's insurance consumers.

As dentists and their patients continue to navigate how to safely provide and receive care during the COVID-19 pandemic, WSDA respectfully requests you consider the following modifications that will help address the rising costs of providing care during the pandemic, accommodate increased needed care due to state-mandated delays, and ensure all Washingtonians are able to access the benefits they pay for.

Account for Rising Costs of PPE

The COVID-19 pandemic has had a significant impact on personal protective equipment (PPE) supply chains for dental offices across the state. Due to high demand and limited supply, prices have increased considerably. These disruptions, and any additional PPE requirements, will result in higher costs for procedures performed in dental offices.

To account for these increased costs, third-party payers providing dental benefits should either adjust the maximum allowable fees for all procedures or allow a standard fee per date of service per patient to accommodate the rising costs of PPE. Not doing so will be an automatic reduction in reimbursement rates.

Prohibit Fee Bundling

Due to Proclamation 20-24, dentists have had to restrict their practices to all but urgent and emergency care and care needed to avoid harm to the patient. Consequently, many patients received temporary or palliative care and extra oral imaging as a means to address emergency issues in the best interest of the patient during the pandemic. For this reason, patients will need to be provided with more definitive care when dental offices across the state slowly return to regular operation.

Accordingly, third-party payers should be prohibited from bundling the fee for the temporary procedure with the payment for the permanent procedure that may be submitted in the future.

Suspend Limited Provisions on Frequency

Delays in care due to the COVID-19 pandemic are causing pent-up demand for dental care throughout the state. In addition, with significant changes to the delivery of care during a pandemic, the rate at which dentists are able to treat patients will decelerate.

Therefore, third-party payers should be prohibited from imposing arbitrary frequency limits that are not in the best interest of patients' oral and overall health. WSDA requests all frequency limits be suspended for at least 24 months to allow dentists to address the growing demand for dental care and to stabilize the oral health conditions of their patients.

Remove Restrictions on Scaling & Root Planing

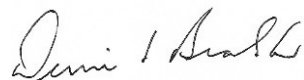
In order to alleviate the need for patients to make multiple trips to a dental office and to minimize their exposure to the COVID-19 pandemic, WSDA requests third-party payers be required to remove the requirement to only allow two quadrants of scaling & root planing to be done on a given day. This requirement should be withdrawn for at least 24 months. Permitting scaling and root planing of all four quadrants at once is not only in the best interest of patients but will also allow dentists to maximize use of already scarce PPE.

COVID-19 Testing Reimbursement

As we prepare to move beyond this pandemic, COVID-19 testing will be an important tool in returning to a normal standard of care. While efforts to include COVID-19 testing in the scope of practice for all dental professionals are underway, WSDA requests you consider the best method for third-party payers to compensate dentists who provide such testing.

Thank you in advance for your consideration of the above issues. If you would like any additional information, or if you have any questions, please do not hesitate to contact WSDA's Executive Director Bracken Killpack at bracken@wsda.org.

Sincerely,



Dennis Bradshaw, DDS
President
Washington State Dental Association