CADP

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December 4, 2012

SENT VIA EMAIL
California Health Benefit Exchange (CHBE)
Attn: Andrea Rosen
560 J Street, Suite 290
Sacramento, CA 95814
info@hbex.ca.gov

Office of Administrative Law (OAL)
300 Capitol Mall, Suite 1250
Sacramento, CA 95814
staff@oal.ca.gov

RE: Proposed Emergency Regulations re Solicitation of Health Plans in California's Exchange

Dear Ms. Rosen and OAL Staff:

On behalf of the California Association of Dental Plans (CADP), this letter addresses the emergency proposed regulations filed on behalf of the California Health Benefit Exchange with the Office of Administrative Law, as posted on November 27th. These proposed rules are currently under review by the OAL and concern the Exchange's contracting process and standards for selecting and contracting with health plans for the offering of health insurance in the Health Benefit Exchange ("Covered California").

As noted in the Delta Dental letter of December 3, in reviewing the proposed Emergency Regulations governing the process for soliciting and accepting bids to offer health plans through Covered California, the proposed regulations do not contain any guidance for Standalone Dental Plans. Such plans are defined in proposed Section 6410, but not otherwise mentioned in the substantive provisions.

On behalf of the Association, Delta Dental's comments reflect those of its members, and we respectfully request that the Exchange and Office of Administrative Law consider those comments in either revising the proposed regulation or in promulgating a supplemental regulation addressing Standalone Dental Plans.

We would welcome any opportunity to meet or speak with you and/or any appropriate staff to discuss these matters. Please know that we stand ready to help when it comes to implementing the dental benefit provisions of the health care reform law.

If you have any questions, please do not hesitate to contact me; 916.446.3122; jmiller@amgroup.us.

Sincerely,

Jackie A. Miller
Executive Director

CC: Bryan Geremia, President
Board of Directors
Pamela Loomis, Nossaman LLP
Mary Powers Antoine, Nossaman LLP