

Performance Standard	Comment	Covered CA response
3-6	<p>We respectfully seek clarification on the proposed 20% increase in DHMO and 10% increase in DPPO performance standards. Based on our 70+ years of experience in dental benefits administration, we have not observed year-over-year utilization improvements of this magnitude. We would appreciate Covered California sharing the research basis / clinical evidence used to set these annual improvement targets, as well as any endorsements by organizations.</p> <p>Our prior understanding of the 70% threshold was based on a blended DHMO/DPPO average, consistent with past contract language. If the intent is now to evaluate achievement of the threshold for each product type independently, we recommend setting product-specific thresholds appropriate to the enrolled population and current delivery frameworks. We would also appreciate Covered California sharing the research basis / clinical evidence used to set the 70% threshold, as well as any endorsements by organizations.</p> <p>We would like to recommend a working session with Covered California and the SADPs to review and discuss the applicable research basis / clinical evidence and benchmarks for dental care utilization improvements. Our Actuaries and Dental Directors are available to share their expertise to help Covered California with the establishment of evidence-based, meaningful and attainable performance standards.</p>	<p>The very low DHMO baseline performance rates result in a much lower improvement expectation compared to DPPOs if the same year over year percentage improvement target is used, widening the disparity already seen.</p> <p>Covered California acknowledges that continued improvement becomes more difficult to achieve at higher levels of performance, and rates of 70% or higher reflect meaningful care delivery to members. This level of performance was recommended by a QDP issuer as the threshold above which no penalty for failure to improve would be applied. Performance rates of 70% or higher demonstrate that a majority of members are receiving care, aligning with Covered California's mission to ensure access to affordable health care and improve health outcomes.</p>
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