

August 17, 2016

Mr. Jim Freeburg  
Special Assistant to the Insurance Commissioner  
Office of the Insurance Commissioner  
Sent via email

Dear Mr. Freeburg:

The Washington State Dental Association (WSDA) and its 4,100 member dentists appreciate the opportunity to provide comment on the proposed rule-making addressing the prior authorization process. We applaud your efforts to make an opaque and often frustrating process more transparent. The difficulties associated with obtaining prior authorization can be discouraging for consumers, create undue stress on dental care providers and staff, and place unnecessary strain on the dentist-patient relationship.

We understand that dental only plans are not currently under consideration in this rule-making process. WSDA urges you to expand your scope to include them. With stand-alone plans representing the major market share for dental care, there is a significant number of providers and patients who will not benefit from your efforts to improve the prior authorization process unless dental only plans are included; and there are major carriers who will be allowed to continue to operate under a different set of rules, which will amplify an already confusing system.

We have reviewed your stakeholder draft published on July 15, 2016, and we are largely in agreement with its contents. However, there is one issue of particular concern to WSDA members that has not yet been addressed in your proposal. It is far too common a practice that a claim will be denied despite having received prior authorization. The ability to deny a claim after it has been approved runs counter to the very reason for obtaining a prior authorization in the first place. Thus, the rules governing such a denial should be very clear on the circumstances in which it would be permissible and the process by which it is made.

We appreciate your consideration of these comments. Your rule-making could be of great benefit to both patients and dental practitioners in our state. We look forward to working with you on this important matter. For questions or additional information, please do not hesitate to contact WSDA Vice-President of Government Affairs Mellani McAleenan at [mellani@wsda.org](mailto:mellani@wsda.org).

Sincerely,



Bryan Edgar, DDS  
WSDA President