



# NCVHS Subcommittee on Standards

*Hearing on Proposed  
CAQH CORE Operating Rules*

**AspenDental**<sup>®</sup>

# Today's Agenda

- 1)** Who is Aspen Dental?  
Operating Rule Review
- 2)**
  - Attachments
  - Eligibility & Benefits
  - Infrastructure
  - Connectivity
- 3)** Key Takeaways



# Who Is Aspen Dental Management, Inc. (ADMI)?

## Background

ADMI is a dental support organization that **provides non-clinical business support and administrative services to over 1000+ Aspen Dental-branded practices in 43 states**, comprising the largest group of branded dental offices in the world.



## Mission

The company was founded with a simple goal in mind: **to break down the barriers that doctors and patients face when it comes to dental care** with the mission to bring better care to more people.



## Goals

An **overarching goal for ADMI is administrative simplification**, which will enable the doctors we support to focus on care delivery.



**ADMI supports federal adoption of all proposed Operating Rules**



# Attachments Operating Rules

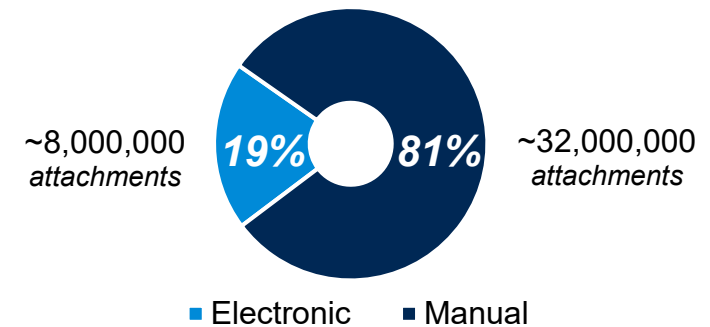
ADMI strongly supports the inclusion of the CAQH CORE Attachments Operating Rules in the Final Rule for HIPAA Attachments Standards CMS-0053-P.

## Attachments Operating Rule Perspective

<b>Critical Statements</b>	<ul style="list-style-type: none"> <li>➤ <b>Dental industry is plagued by proprietary and manual approaches</b> for exchanging attachments. Adoption of electronic exchange methods is impeded by the lack of federal electronic standards and operating rules.</li> <li>➤ <b>Mandates are proven tools</b> to driving electronic adoption. Standards with supporting operating rules have stimulated rapid, large-scale implementation and conformance in the past.</li> </ul>
<b>Implications of Adoption</b>	<ul style="list-style-type: none"> <li>➤ <b>More uniform guidelines across the dental industry will reduce attachment rejections and manual processing.</b></li> <li>➤ Given dental x-rays and impression scans are often very large, file size requirements for attachments are especially valuable.</li> </ul>
<b>Opportunity Costs of Delay</b>	<ul style="list-style-type: none"> <li>➤ Slow and costly adjudication of manual attachments has led to <b>delays in patient care and negatively impacts revenue.</b></li> <li>➤ ADMI expends significant time and monetary resources processing attachments given the <b>high volume of dental attachments</b> required by plans for claims adjudication.</li> </ul>

## Annual Dental Industry Attachments Volume

(2021 CAQH Index)



## Estimated Dental Provider Savings With Full Adoption of Electronic Attachments

(based on medical savings; actual #s likely higher)

**\$99.2 Million**

Approximate Dental Provider Cost Savings Opportunity\*



**3.2 Million Hours**

Approximate Dental Provider Time Savings Opportunity\*



\*Per the 2021 CAQH Index, \$3.10 and 6 mins are the *medical* provider savings for electronic attachments. Medical savings are used as analogous metrics.

# Eligibility & Benefits Operating Rule

ADMI strongly supports federal adoption of the updated Eligibility & Benefits Data Content Rule given the benefits accrued to dental providers.

## Eligibility & Benefits Operating Rule Perspective

<b>Critical Statements</b>	<ul style="list-style-type: none"> <li>➤ In the dental industry, <b>many services are limited to a set number of visits in a specific timeframe</b> and require frequent eligibility verification.             <ul style="list-style-type: none"> <li>• <b>Each electronic eligibility verification saves the dental industry \$9.12 per transaction*</b>; ADMI conducts over 1 million eligibility checks annually resulting in a significant saving opportunity.</li> </ul> </li> </ul>
<b>Implications of Adoption</b>	<ul style="list-style-type: none"> <li>➤ <b>Expanded subset of dental STCs and procedure-level requirements provide critical support to dental stakeholders</b> such as periodontal and oral surgery providers.</li> <li>➤ Access to information provides <b>clarity into granular coverage detail and prior authorization requirements</b>, which <b>reduces surprise bills</b> and informs patient care decisions.</li> </ul>
<b>Opportunity Costs of Delay</b>	<ul style="list-style-type: none"> <li>➤ With no update, the <b>dental patient experience will remain below expectations and delays will persist</b>.             <ul style="list-style-type: none"> <li>• A limited selection of service type codes means <b>staff must continue to manually call dental plans</b> for coverage, benefits, and financial information that is often inaccurate and incomplete.</li> </ul> </li> </ul>

## Expanded Subset of Dental Service Type Code (STC) Definitions

Diagnostic Dental	Maxillofacial Prosthetics
Periodontics	Adjunctive Dental Services
Restorative	Dental Crowns
Endodontics	Dental Accident
Orthodontics	Prosthodontics
Routine Preventative Dental	

## ADMI Eligibility & Benefits

**>1 Million**

*Transactions per Year*



# Infrastructure Rules for Eligibility & Benefits, Claim Status, and ERA

The updated Infrastructure Rules support ADMI's ability to care for its patients by strengthening and increasing predictability of system governance.

Infrastructure Rule Perspective	
<b>Critical Statements</b>	<ul style="list-style-type: none"> <li>Increased system availability ensures that <b>dental plans receive and respond to ADMI requests during all clinic hours.</b> <ul style="list-style-type: none"> <li>Over 50% of ADMI visits are insured, and plan eligibility responses are critical for care planning and experience.</li> </ul> </li> </ul>
<b>Implications of Adoption</b>	<ul style="list-style-type: none"> <li>Enhancements to system availability ensure that providers have the data they need, when they need it the most by facilitating a <b>reliable, consistent, and predictable schedule.</b></li> </ul>
<b>Opportunity Costs of Delay</b>	<ul style="list-style-type: none"> <li>Updates to the Companion Guide mean the format can be used as a starting point for companion guide development for non-X12 standards.                     <ul style="list-style-type: none"> <li>Support of emerging standards <b>promotes innovation; not acting would stifle industry progress</b> for several years.</li> </ul> </li> </ul>

**Industry Savings – Manual to Electronic**

*Dental Industry Savings per Electronic Eligibility Transaction\**

**\$9.12**                      **10 min**

*Dental Industry Savings per Electronic Claims Status Transaction\**

**\$10.76**                      **14 min**



**Availability Increases**

*Increase from 86% to 90% health plan system availability supports dental office hours*

**7 hours**  
weekly

**364 hours**  
annually



# Connectivity Rule Update

The updated Connectivity Rule aligns with ADMI's connectivity and security strategy; federal adoption enables us to capitalize on our investments and ensures a uniform approach across all trading partners.

## Connectivity Rule Perspective

<b>Critical Statements</b>	<ul style="list-style-type: none"><li>➤ Costs associated with updates are modest, and long-term benefits are significant and <b>support long-term organizational goals.</b></li></ul>
<b>Implications of Adoption</b>	<ul style="list-style-type: none"><li>➤ The updated Connectivity Rule <b>expands support for APIs and enhances security, digital certification, and authorization.</b></li><li>➤ With the safe harbor as a foundational component, ADMI can <b>optimize current relationships without the need to overhaul existing connections.</b></li></ul>
<b>Opportunity Costs of Delay</b>	<ul style="list-style-type: none"><li>➤ Under current mandates, industry must maintain support for outdated rules, which is costly and <b>hinders technological growth and interoperability.</b></li><li>➤ <b>Current security standards are outdated, which increases exposure to malicious activity,</b> potentially of significant cost to healthcare organizations.</li></ul>



# Key Takeaways

ADMI fully supports federal adoption of the proposed operating rules and encourages NCVHS to promote industry progress by recommending federal adoption to HHS.

- 1) The dental industry will benefit tremendously from the proposed operating rules updates as they **specifically address dental business scenarios for eligibility verification and align with long-term connectivity and security goals**, reducing surprise billing and improving overall patient satisfaction.

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- 2) **NCVHS should recommend inclusion of attachments operating rules in the final rule for the attachments standards.** Call to action is now to capitalize on the opportunity to include the attachments operating rules in the final attachments rule, ensuring more rapid, uniform implementations and long-term time and cost savings.

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- 3) An overarching goal for ADMI is administrative simplification, which **enables the dentists we support to focus on care delivery rather than administration.** The proposed CAQH CORE Operating Rules support this goal by automating key revenue cycle transactions, reducing provider burden. **Operating rules are a proven, necessary tool for driving automation and interoperability across business processes.**

