

NCVHS Subcommittee on Standards

*Hearing on Proposed
CAQH CORE Operating Rules*

AspenDental[®]



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	Mission	Goals
<p>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.</p>	<p>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.</p>	<p>An overarching goal for ADMI is administrative simplification, which will enable the doctors we support to focus on care delivery.</p>
		

ADMI supports federal adoption of all proposed Operating Rules



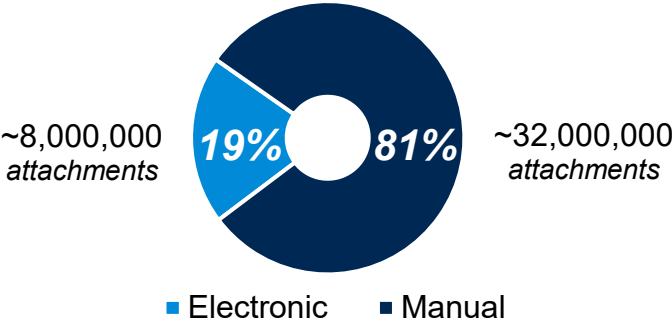
Attachments Operating Rules

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

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	3.2 Million Hours
Approximate Dental Provider Cost Savings Opportunity*	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

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

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	
Critical Statements	<div>➤ Increased system availability ensures that dental plans receive and respond to ADMI requests during all clinic hours.<ul style="list-style-type: none">Over 50% of ADMI visits are insured, and plan eligibility responses are critical for care planning and experience.</div>
Implications of Adoption	<div>➤ Enhancements to system availability ensure that providers have the data they need, when they need it the most by facilitating a reliable, consistent, and predictable schedule.</div>
Opportunity Costs of Delay	<div>➤ 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">Support of emerging standards promotes innovation; not acting would stifle industry progress for several years.</div>

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 **364 hours**
weekly annually



*2021 CAQH Index.

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

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



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.

- 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.

- 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.**

