



May 6, 2025

Senator Donna Bailey  
Chair, Committee on Health Coverage, Insurance and Financial Services  
100 State House Station  
Augusta, ME 04333

**RE: LD 1834 An Act to Allow Dental Care Providers to Opt In to Receive Claim Reimbursement Payments Made by Virtual Credit Cards**

Dear Chair Bailey and Members of the Committee,

On behalf of the National Association of Dental Plans (NADP)<sup>1</sup>, America's Health Insurance Plans (AHIP)<sup>2</sup>, and the American Council of Life Insurers (ACLI)<sup>3</sup>, we are writing to provide comments on LD 1834, which would severely limit payment options for providers by creating an opt-in process for payment by virtual credit cards

Virtual credit cards allow providers to obtain reimbursement for services quickly and efficiently using existing credit card terminals. Adding additional requirements for providers to opt-in to receipt of payments utilizing this method, as described in section 2(c), would create an undue burden on providers and plans, resulting in potential delays in payments and limiting access to virtual credit cards.

The National Council of Insurance Legislators adopted the Transparency in Dental Benefits Contracting Model Act in 2020, which includes a model for the use of virtual credit cards. NCOIL recognized the importance of transparency and ensuring communication between providers and plans, resulting in the adoption of the opt-out structure. This model prohibits plans from offering virtual credit cards as the only form of payment and allows providers the ability to choose what payment method is best suited for their practice, including the option to opt-out of virtual credit card payment.

We respectfully request that LD 1834 be amended to align with the NCOIL Transparency in Dental Benefits Contracting Model Act by amending subsection 2. (C) of Sec. 1. 24-A MRSA §2770-A, Sec. 2. 24-A MRSA §2847-X, Sec. 3. 24-A MRSA §4261, and Sec. 4. 24-A MRSA §4320-W to read: [t]he insurer advises the dental care provider or a designee of the provider of the available methods of payment and provides clear instructions to the dental care provider or a designee of the provider as to how to select an alternative

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<sup>1</sup> NADP is the largest non-profit trade association focused exclusively on the dental benefits industry. NADP's members provide dental HMO, dental PPO, dental indemnity and discount dental products to more than 200 million Americans with dental benefits. Our members include the entire spectrum of dental carriers: companies that provide both medical and dental coverage, companies that provide only dental coverage, major national carriers, regional, and single state companies, as well as companies organized as non-profit plans.

<sup>2</sup> AHIP is the national association whose members provide health care coverage, services, and solutions to hundreds of millions of Americans every day. We are committed to market-based solutions and public-private partnerships that make health care better and to help create a space where coverage is more affordable and accessible for everyone.

<sup>3</sup> The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI's member companies are dedicated to protecting consumers' financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI's 280 member companies represent 94 percent of industry assets in the United States.

payment method.

This model legislation balances provider payment flexibility with transparency and choice, ensuring that providers have access to a no-cost payment method while maintaining the option for electronic payment solutions like virtual credit cards. Virtual credit cards offer administrative efficiency, reduce payment delays, and help plans ensure timely and traceable reimbursement.

Thank you again for your attention to this matter. We appreciate your consideration and welcome the opportunity to provide additional information or support your deliberations in any way.

Sincerely,



Bianca Balale  
Director of Government Relations  
National Association of Dental  
Plans



Jill Rickard  
Regional VP – State Relations  
American Council of Life  
Insurers



Sarah Lynn Geiger, MPA  
Regional Director, State Affairs  
America's Health Insurance  
Plans