



August 10, 2017

The Honorable Lamar Alexander
Chairman, Committee on
Health, Education, Labor & Pensions
U.S. Senate
Washington, DC 20510

The Honorable Patty Murray
Ranking Member, Committee on
Health, Education, Labor & Pensions
U.S. Senate
Washington, DC 20510

Dear Chairman Alexander and Ranking Member Murray,

On behalf of our members, the National Association of Dental Plans (NADP) is pleased to share important considerations and offer our expertise about dental benefits as the Committee considers policy alternatives and approaches to stabilize and strengthen the individual health insurance markets.

Public health insurance Marketplaces have been an important avenue for access to individual dental coverage, allowing more than 1.7 million Americans, primarily adults, to gain dental coverage through separate dental plans on state and federal Marketplaces in 2016. This was about 13% of all applicants for Marketplace commercial coverage. As the leading representative of the dental benefits industry, NADP offers for your consideration the following recommendations that would help to stabilize and improve consumer choice of dental benefits in the small group and individual markets:

- **Recommendation: Restore choice in purchasing dental benefits for employers, employees and families in group markets (see S. 3244, 114th Congress).** Under current implementation of the ACA, differences in the way dental benefits can be offered in the small and large group market cause confusion for insurers, brokers and consumers and separate children from traditional family dental coverage. Federal policy should allow dental benefits to be purchased as part of a family policy through a small employer as is done in the Marketplaces and in the large group market. After medical coverage, dental is the second most requested benefit by employees. Employers in the large and small group markets offer dental benefits because of this demand and their knowledge of oral and overall health connections.

In the 114th Congress, Senators Roberts and Bennet introduced [S.3244](#), the Aligning Children's Dental Coverage Act, a bipartisan effort to ensure equal access to family dental coverage in both the large and small group markets. NADP recommends the bill language be included in Senate legislation addressing the individual and small

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group markets. S.3244 language will alleviate insurer, broker and consumer confusion and restore choice for families in purchasing dental benefits.

- **Recommendation: Provide direct access to dental benefits by allowing the independent purchase of dental coverage through the Marketplaces.** Currently, when individuals or families with coverage through Marketplaces cancel or change medical coverage, their separate dental coverage is automatically non-renewed even though the individual may want to keep that coverage. The purchase and maintenance of dental coverage on the Marketplaces should be separated from the decision on medical coverage. In addition to eliminating the unintended plan terminations, this will allow consumers and families to enroll in a standalone dental plan regardless of whether they first purchased a medical plan.

Allowing the independent purchase of dental coverage through Marketplaces will expand opportunities for individuals and families who already have medical coverage through their employer or some other program. They will be able to use the Marketplaces to compare dental plan offerings and purchase a dental plan that meets their needs. The separation of the purchase of medical and dental coverage would be of particular benefit to seniors, who do not currently have dental benefits under Medicare, and provide them access to the purchase of dental coverage.

Individuals and families are more likely to visit the dentist and seek critical preventive oral services, such as cleanings, when they have dental coverage. Preventive dental care reduces the likelihood of more expensive dental procedures, saving money and reducing the possibility of emergency room visits. There are only two diseases impacting dental: caries (which is the disease that causes cavities) and periodontal (gum disease); both are preventable with early and regular check-ups. Unfortunately, even though caries is preventable, it is the leading disease in children, and is six times more prevalent than asthma. Oral health issues are #7 on the list of top ten most costly health conditions for Americans in 2013 (JAMA). And increasingly, treatment of periodontal disease is being connected to lowering the treatment costs for the two most costly medical conditions, i.e. diabetes and heart conditions. Obtaining and maintaining dental coverage that is affordable and accessible is important in reducing overall health care costs and improving oral health. The recommendations that we have made above will help individuals and families get and keep dental coverage that fits their needs.

Thank you for your consideration of NADP's views. We look forward to working with you and Members of your Committee to ensure consumer choice and access to dental care in a way that is consistent with NADP's principles—principles that value oral health and the role of the dental benefits industry in improving access to affordable, quality dental care.

Sincerely,



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NADP DESCRIPTION

NADP is the largest non-profit trade association focused exclusively on the dental benefits industry, including dental PPOs, dental HMOs, discount saving plans and dental indemnity products. NADP's members provide dental benefits to more than 90 percent of the 211 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. Dental plans have successfully partnered with individuals, employers and government programs to offer dental benefits that are cost-effective and highly valued by consumers.

ⁱ S.3244 - 114th Congress (2015-2016): Aligning Children's Dental Coverage Act <http://bit.ly/2qamgsR>. More information is also available in an NADP Issue Brief: <http://bit.ly/2rdCOnY>

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