

October 22, 2012

United States Office of Personnel Management
Attn: Laurie Bodenheimer
1900 E Street NW, RM 2H28
Washington, DC 20415
Sent via email: laurie.bodenheimer@opm.gov

Re: Request for Information Number OPM35-12-R-0006

Dear Ms. Bodenheimer:

The National Association of Dental Plans (NADP) appreciates the opportunity to provide comments on the Request for Information Number OPM35-12-R-0006 released by the Office of Personnel Management (OPM) on September 20, 2012. The Affordable Care Act (ACA) requires state Exchanges to include multi-State plans (MSP) approved by OPM to offer policies (eventually) in all 50 states. OPM will implement and administer the MSP Program which the ACA requires to include at least two health insurance issuers. The RFI requests comments on OPM's draft application to be utilized by carriers applying to become MSPs.

As we stated in 2011, NADP's recommends that OPM allow stand-alone dental carriers to be designated as a MSPs in addition to medical carriers. In recognition of the fact that 99% of dental policies are written separately from consumers' medical coverage today, the ACA allows for stand-alone dental carriers to offer dental coverage within Exchanges. Exchange consumers should have multi-state choices which parallel the private/commercial insurance marketplace. OPM can and should allow for the inclusion of dental carriers on a national level to ensure the pediatric dental benefit of the ACA's essential health benefit (EHB) package is offered alongside a medical benefit.

The proposed MSP Program Application does not specifically accommodate application by a dental carrier. While not precluded the question on page 17, question 10 under the Provider Contracts section seems to suggest that issuers of medical coverage will be required to include the pediatric dental benefit which will be offered by separate dental carriers in state Exchanges in their benefits:

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“Does your current and proposed MSP provider network include dental providers? If not, describe how you will deliver pediatric dental services required by section 1302 of the Affordable Care Act.”

NADP recommends that OPM add to its standards for medical carriers to be qualified as MSPs, the offering of benefit plans without pediatric dental services. This will allow consumers in the various states that prefer a stand-alone dental plan or that have a stand-alone dental policy now to purchase a policy that is not duplicative of coverage.

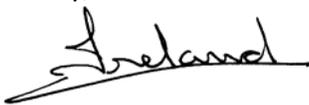
By allowing applications of dental MSPs, medical carriers would not be required to include dental coverage in their benefits as allowed by the ACA. And OPM can provide broader MSP choices of benefits including medical only, medical and dental, and stand-alone dental carriers.

The OPM has the experience required to accept applications from dental carriers. In 2005, separate dental policies were acknowledged by Congress as key benefits that should be offered to federal employees with the creation of the Federal Employee Dental and Vision Program (FEDVIP) as supplemental coverage to the Federal Employees Health Benefit Program (FEHBP). FEDVIP allows federal employees to purchase dental coverage in a manner parallel to their counterparts working in the private market with traditional employer medical and dental coverage.

By allowing dental specific MSPs to be included in state Exchange offerings, OPM would simplify Exchange administration for the states. The availability of a separate dental plan in the state Exchange allows the certification of medical carriers that do not cover pediatric dental services without the state first certifying separate dental plans at the state level. Additionally, consumers residing in multiple states (e.g., students living out of state or children residing with non-custodial parents, etc.) would have a choice of a plan that meets their needs. And, when a family maintains a separate dental plan outside the Exchange, they will have an option of selecting an MSP that does not include pediatric dental benefits which duplicate the coverage they have.

NADP appreciates the opportunity to share our views on this important issue and look forward to future discussions on Multi-State plans. Several of our member companies will also be submitting comments for your consideration. Please contact NADP’s Director of Government Relations, Kris Hathaway at 972.458.6998x111 or khathaway@nadp.org for questions and additional information. Again, thank you for your consideration.

Sincerely,



Evelyn F. Ireland, CAE
Executive Director

NADP DESCRIPTION

NADP is the largest non-profit trade association focused exclusively on the dental benefits industry, i.e. dental PPOs, dental HMOs, discount dental plans and dental indemnity products. NADP’s members provide dental benefits to over 92 percent of the 176 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.

