



September 8, 2011

United States Office of Personnel Management  
Attn: Cheryl D. Allen  
Contracting Officer  
Re: Request for Information Number OPM35-11-R-0001  
Sent via email: Cheryl.allen@opm.gov

Dear Ms. Allen,

The National Association of Dental Plans (NADP) would like to comment on the Request for Information Number OPM35-11-R-0001 released by the Office of Personnel Management (OPM) on June 16, 2011. In particular, we believe Multi-State separate dental policies should be included in the RFP.

The Patient Protection and Affordable Care Act (PPACA) requires that at least two Multi-State qualified health plans (QHPs) be available as part of each state Exchange in the individual and small group markets. NADP recommends Multi-State separate dental policies should also be required to be available as options in each state Exchange. These dental policies would meet the “pediatric oral services” as defined by the U.S. Department of Health and Human Services and required as part of the Essential Health Benefits Package (EHBP).

The Office of Personnel Management should include in the Multi-State RFP an allowance for Multi-State dental policies to be available in each state Exchange for several reasons:

- In 2005, separate dental policies were acknowledged by Congress as key benefits that should be offered to federal employees, and created the Federal Employee Dental and Vision Program (FEDVIP) as supplemental coverage to the current Federal Employees Health Benefit Program (FEHBP). FEDVIP allows federal employees to purchase additional voluntary coverage more parallel to their counterparts working in the private market with traditional employer coverage where 97% of dental coverage is provided through separate dental policies.
- Offering Multi-State separate dental policies in each state Exchange eliminates the administrative confusion of QHPs not knowing whether a separate dental policy is offered in a state Exchange. ACA requires QHPs to include “pediatric oral services” in their medical policies to meet the required EHBP inside the Exchanges, unless a standalone dental plan offering the “pediatric oral services” also offers that coverage in the Exchange. In addition, a Multi-State separate dental policy would provide the QHP issuer with sufficient advance notice prior to the QHP certification process that it would not need to provide “pediatric oral services” in a state exchange.

**National Association of Dental Plans**

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- By OPM allowing Multi-State separate dental policies to be available in state Exchanges, it increases administrative simplicity for the states as well as widens consumer choice that better reflect today's various options for dental policies in the private market. A Scenario that further illustrates potential complexities: If a family has children residing in multiple states (e.g., students living out of state or children residing with non-custodial parents, etc.) and that family either (1) prefers to purchase dental from a standalone dental plan, or (2) must purchase dental from a QHP as there are no dental plans on the Exchange, it could result in family members with multiple dental policies. This is not consumer-friendly and would cause an administrative burden not only on the states, but directly on families. A Multi-State dental plan would allow households with members in multiple states to remain covered by the same dental policy or company.

NADP greatly appreciates the opportunity to share our views on this important issue to the dental benefits industry. As the representative and nationally recognized resource on dental benefits, we are available to answer any of your questions with regard to the dental benefits industry. Please feel free to contact NADP for any additional information.

Sincerely,



Kris Hathaway  
Director of Government Relations  
Email: khathaway@nadp.org, Ph: (972)458-6998x111

*NADP is the representative and recognized resource of the dental benefits industry. NADP is the only national trade organization that includes the full spectrum of dental benefits companies operating in the United States. NADP's members provide Dental HMO, Dental PPO, Dental Indemnity and Discount Dental products to 143 million Americans, over 85% of all Americans with dental benefits.*

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