



December 11, 2012

Mr. Greg Paradiso
Exchange Project Director, Department of Vermont Health Access
312 Hurricane Lane, Suite 201
Williston, VT 05495
Sent via email

Re: Cost-Sharing Limits for Stand-Alone Dental Plans in VT RFP

Dear Mr. Paradiso,

The National Association of Dental Plans (NADP) is writing to provide updated information on how cost-sharing limits are applied to stand-alone dental plans within new regulations proposed by the federal government. As released on November 20, CMS-9908-P “PPACA, Standards Related to Essential Health Benefits, Actuarial Value and Accreditation” (EHB Regulations) directly impacts the RFP released on November 1, 2012 by Vermont Health Connect.

Vermont RFP Dental Clarification

Vermont Health Connect’s Selection of Qualified Health Plans RFP states that “QHPs and limited scope dental plans offering pediatric oral health benefits must accumulate claims to an integrated deductible and an integrated out of pocket maximum” (20). However, in Appendix H on Dental Benefit Design, it states that “Dental plan offerings must comply with ACA Section 1302(c) and if integrated into a health benefit plan, comply with OOP maximum limitations” (52).

As relayed in the EHB Regulations, separate dental policies will have separate allocations on a consumer’s cost sharing and out of pocket (OOP) maximums from their chosen QHP. Cost sharing limits will need to be “reasonable” for separate dental policies, which HHS has requested comments on prior to finalizing the regulations. Additional clarification with HHS final EHB Regulations is expected in early 2013.

Due to the guidance on separate dental policies in the recently released EHB Regulations, NADP recommends that Vermont Health Connect provide a notice to carriers that cost sharing for separate dental policies will need to be addressed in the near future, but coordination among QHPs and dental carriers will not be required.

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NADP greatly appreciates the attention to dental coverage within Vermont's RFP, and believes the EHB regulations allowance for separate cost sharing will better assist Exchanges, carriers and consumers alike. We look forward to future discussions on these critical issues to the residents of Vermont. Please contact me with any questions regarding these comments at khathaway@nadp.org or 972 458-6998x111. Again, thank you for your consideration.

Sincerely,



Kris Hathaway
Director of Government Relations
National Association of Dental Plans
12700 Park Central Dr., Suite 400
Dallas, TX 75251

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 90 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.

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