

Congress of the United States
Washington, DC 20515

December 19, 2018

The Honorable Seema Verma
Administrator
Centers for Medicare and Medicaid Services
200 Independence Avenue SW
Washington, DC 20201

Dear Administrator Verma:

We are writing to request that the Center for Consumer Information & Insurance Oversight (CCIIO) separate the purchase of medical and dental insurance plans within the federal individual Marketplace platform prior to Open Enrollment 2020.

Section 1311(d)(2)(B)(ii) of the Affordable Care Act allows consumers to purchase dental benefits as part of a Qualified Health Plan (QHP) or through a stand-alone dental plan (SADP) in the federal insurance Marketplaces.

Since its inception the platform has linked the purchase of a QHP with that of an SADP. This action limits the ability of a consumer to simply select an SADP on the Marketplace if, for example, the individual already has medical coverage through other means. Additionally, the platform limits the ability of the consumer to choose a dental plan during open enrollment, without also going through the re-enrollment process for their medical plan.

More troubling, whenever a change of medical coverage is made, whether by the consumer or by the Marketplace, the consumer is forced to actively re-enroll in their dental plan, even if they did not intend to make a change to their dental plan. If they do not actively re-enroll, the consumer's dental plan is canceled without notification. Many of our constituents do not know they need to re-enroll and do not realize they have lost dental coverage until they arrive at their next dental appointment.

We know that 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. And there is increasing evidence that the treatment of periodontal disease is connected to lower treatment costs for the two most costly medical conditions in adults, i.e. diabetes and heart conditions.

We believe CCIIO has the authority and statutory duty to permit the purchase of SADPs independent from medical plans. While the portion of the premium allocable to pediatric dental benefits must be considered in the calculation of premium tax credits in certain circumstances,

that calculation does not dictate that medical and dental plan enrollment be linked or administered together. This technical flaw should be remedied no later than Open Enrollment for 2020 to ensure the continuity of dental health coverage and care. Thank you for your consideration of this very important issue.

Sincerely,

Don's Matsui

DORIS MATSUI
Member of Congress

H. Morgan Griffith

H. MORGAN GRIFFITH
Member of Congress

Brett Guthrie

BRETT GUTHRIE
Member of Congress

Mike Kelly

MIKE KELLY
Member of Congress

David Schweikert

DAVID SCHWEIKERT
Member of Congress

Chris Collins

CHRIS COLLINS
Member of Congress

Jason Smith

JASON SMITH
Member of Congress

Susan Brooks

SUSAN BROOKS
Member of Congress

Jackie Walorski

JACKIE WALORSKI
Member of Congress

Tim Walberg

TIM WALBERG
Member of Congress


Roger W. Marshall

ROGER MARSHALL M.D.
Member of Congress

Mike Simpson

MIKE SIMPSON
Member of Congress


BILLY LONG
Member of Congress


MARKWAYNE MULLIN
Member of Congress


BRAD WENSTRUP
Member of Congress


GUS M. BILIRAKIS
Member of Congress


KENNY MARCHANT
Member of Congress