December 18, 2018

The Honorable Seema Verma  
Administrator  
Center for Medicare & Medicaid Services  
200 Independence Ave, S.W.  
Washington, DC 20201

Dear Administrator Verma:

We are writing to request that the Center for Consumer Information & Insurance Oversight (CCIIO) provide Americans with the option of purchasing dental coverage independent of medical coverage on the federal health insurance marketplace. This change will increase access to dental care and protect consumers from the unintended termination of their dental coverage.

As you know, oral health is a critical component of overall health and wellness, and ensuring coverage of dental care has the potential to reduce costs while improving outcomes. When individuals and families have dental coverage, they are more likely to visit the dentist and receive critical dental care. Without it, many are forced to forgo preventive care, which can lead to emergency room visits and expensive procedures down the road. For example, despite the fact that dental caries are preventable, they are the leading cause of disease in children today, and the lack of proper dental treatment is exacerbating the costs of treating many other health conditions.

The statute allows consumers to purchase dental benefits in the health insurance Marketplace as part of a Qualified Health Plan (QHP) or through a separate, stand-alone dental plan. Additionally, there is no requirement in statute to establish any link for the purchase and administration of stand-alone dental plans. While the portion of dental premium allocable to pediatric dental benefits must be considered in the calculation of APTC in certain circumstances, that calculation does not dictate that QHPs and SADPs be purchased together.

However, CMS designed the Marketplace in a way that linked medical and dental enrollment. This has caused two major issues. First, individuals and families are prevented from independently buying a stand-alone dental plan on the Marketplace. This means consumers first have to enroll in medical coverage to shop for and purchase dental benefits. Second, any change in a consumer’s health care plan terminates dental coverage. The consumer is often unaware this has occurred until they seek out dental care and realize the dental coverage for the services they need has been cancelled.

Given the importance of expanding access to dental care, we strongly urge CMS to fix the Marketplace design flaw and decouple medical and dental enrollment. This solution is consistent with existing statute and will ensure that individuals and families get the dental care they need.
Thank you for your attention to this matter and we look forward to working with you to resolve the issue.

Sincerely,

Debbie Stabenow
United States Senator

Pat Roberts
United States Senator

Sherrod Brown
United States Senator

Shelley Moore Capito
United States Senator

Richard Blumenthal
United States Senator

Patrick J. Toomey
United States Senator

Gary C. Peters
United States Senator

Lisa Murkowski
United States Senator

Angus S. King, Jr.
United States Senator

Joe Manchin III
United States Senator

Kirsten Gillibrand
United States Senator

Chris Van Hollen
United States Senator
Robert P. Casey, Jr.
United States Senator

Amy Klobuchar
United States Senator

Christopher A. Coons
United States Senator

Bernard Sanders
United States Senator

Mazie K. Hirono
United States Senator

Jeffrey A. Merkley
United States Senator

Cory A. Booker
United States Senator

Tina Smith
United States Senator