

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
Center for Consumer Information and Insurance Oversight  
200 Independence Avenue SW  
Washington, DC 20201



---

November 16, 2015

Ms. Kris Hathaway  
National Association of Dental Plans  
12700 Park Central, Suite 400  
Dallas, TX 75251-1529

Dear Ms. Hathaway:

Thank you for your letter regarding adult dental benefit and icon display on Plan Preview/Plan Compare on HealthCare.gov. We appreciate that your organizations collectively provided this important feedback regarding the technical correction made to the “Dental: Child & Adult” display on HealthCare.gov. We realize the correction caused concern to affected issuers and seek to improve notification to issuers of planned technical corrections in the future.

We appreciate your comments regarding using the User Guide as a policy tool. We believe that how plans are displayed is entirely an operational function of HealthCare.gov and use the User Guide to communicate instructions for how issuers can ensure proper display of their Qualified Health Plans on HealthCare.gov. Further, we established the labeling methodology for stand-alone dental plans (SADPs) to ensure that consumers looking for adult dental benefits are displayed with an icon that represents the full range of covered dental services. We believe that a typical consumer buying a SADP identified by the “Dental: Child & Adult” icon should expect the full range of services to be covered, including Routine, Basic, and Major services. However, we realize that the needs of consumers can differ widely and we will consider a method by which we solicit comments on this policy.

Regarding comments on removing all identifying dental icons, we do not anticipate removing the “Dental: Child & Adult” icon for Plan Year 2016. We believe that the icon and labeling policy can make the shopping experience for consumers much easier. However, as you have been made aware, we have made modifications to HealthCare.gov to notify consumers looking for adult coverage, that “All stand-alone dental plans cover children’s dental benefits and if their enrollment group includes an adult, all of the dental plans displayed cover some adult dental benefits, but the plans listed as “Dental: Child and Adult” provide the most adult dental benefits.” While we appreciate that this is not aligned with your specific request, we believe this should mitigate any consumer confusion while maintaining our existing policy for display as noted above. We will consider your recommendation as we plan for the Plan Year 2017 QHP certification season.

Again, thank you for your letter. Please do not hesitate to contact me with any further thoughts or concerns.

Sincerely,



Kevin J. Counihan

Chief Executive Officer, Health Insurance Marketplaces

Director, Center for Consumer Information & Insurance Oversight

cc: Jeanette Thornton, America's Health Insurance Plans

Chad Olson, Delta Dental Plans Association