



March 2, 2015

U.S. Department of Labor, Department of the Treasury, and Department of Health and Human Services

Office of Health Plan Standards and Compliance Assistance

Employee Benefits Security Administration, Room N-5653

200 Constitution Avenue NW., Washington DC 20210

Sent electronically: [www.regulations.gov](http://www.regulations.gov)

Re: **Summary of Benefits and Coverage; CMS-9938-P**

Dear Secretary Perez, Secretary Lew and Secretary Burwell:

The National Association of Dental Plans (NADP) offers a recommendation to the December 30, 2014 Federal Register Notice and Proposed Rule on the Summary of Benefits and Coverage and Uniform Glossary (SBC). Through the Affordable Care Act (ACA), the SBC is a required form explaining medical benefits offered by carriers. The SBC was developed as an easy-to-understand overview of benefits and for consumers to more easily compare health coverage options.

The nuances of how dental may be embedded within medical coverage were unclear at the time the SBC was drafted. The SBC needs to clearly elucidate whether the policy has a separate dental deductible for pediatric dental services. Lacking specific instructions, carriers have taken three different approaches to identifying whether a separate deductible applies to dental benefits:

1. Carrier lists a separate dental deductible under the "Limitations & Exceptions" heading in the "Dental check up" row;
2. Carrier lists a separate dental deductible in the "other deductibles for specific services" row; or
3. Carrier does not disclose a separate dental deductible.

Understandably, this inconsistency can create confusion for a consumer trying to compare dental benefits embedded within a medical policy.

- NADP recommends the SBC instructions clarify that carriers must include within the SBC whether there is a separate deductible for pediatric dental services and specify exactly where the dental deductible should be included within the SBC form.

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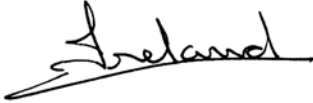
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While the 2015 revised templates and plan compare within healthcare.gov have improved in explaining dental benefits within a medical policy, the SBC is an important tool that could be similarly improved with simple clarifications to the instructions.

NADP greatly appreciates the opportunity to provide our expertise and look forward to an improved SBC so that consumers may have the best experience of being able to compare embedded dental policies more easily. For any follow-up or questions, please contact NADP's Director of Government Relations, Kris Hathaway at [khathaway@nadp.org](mailto:khathaway@nadp.org) or (972) 458-6998x111.

Sincerely,



Evelyn F. Ireland, CAE  
Executive Director  
National Association of Dental Plans

#### **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 approximately 90 percent of the 187 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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