



June 29, 2015

The Honorable Kevin Counihan
Department of Health & Human Services, Centers for Medicare & Medicaid Services
Center for Consumer Information & Insurance Oversight
200 Independence Avenue SW
Washington, DC 20201
Sent via: OutofPocketCostEstimator@cms.hhs.gov

Dear Mr. Counihan,

The National Association of Dental Plans (NADP) is providing feedback to the CMS Bulletin on "Proposed Out-Of-Pocket (OOP) Cost Comparison Tool for the Federally-facilitated Marketplaces (FFM)," released on May 29, 2015.

The Bulletin provides an introduction to the OOP Calculator, a new consumer decision tool to be available in the FFM. The tool will assist consumers in narrowing their medical policy choices based on a better understanding of their overall out of pocket costs in addition to premiums.

Recommendation: The Bulletin states dental plans will not be included in the cost calculator at this time (pg. 2). NADP recommends a clear notification posted for consumers making them aware of this omission. While the tool will assist consumers with their medical coverage purchasing decisions, a clear statement should include: an explanation the tool does not include costs for possible dental services, and a reminder the medical policy may include embedded dental coverage or the consumer may want to consider purchasing an additional separate dental policy. Consumers should be aware of other potential costs when weighing their selections.

NADP greatly appreciates the opportunity to provide our expertise and recommendations. For any follow up or questions, please contact NADP's Director of Government Relations, Kris Hathaway at khathaway@nadp.org or (928)458-6998x111.

Sincerely,

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

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