



September 23, 2009

The Honorable Harry Reid  
Senate Majority Leader  
S-221 Capitol Building  
Washington, DC 20510

Dear Majority Leader Reid:

The National Business Group on Health (Business Group) applauds your efforts to improve quality and reduce the costs of health care as you seek to expand coverage for the uninsured and for your efforts to improve access to oral and vision services. Regarding the latter, we are concerned about the requirement in the current health care reform bills that “qualified health benefits plans” must bundle pediatric vision and dental services with health services. While we strongly advocate for comprehensive vision and dental benefits, we believe that this requirement will unintentionally cause significant disruptions in families’ dental and vision coverage. We urge you to include amendments, such as Senator Debbie Stabenow’s amendment in the Senate Finance Committee allowing stand alone plans to sell coverage in the exchanges as a buy-in option, to the America’s Healthy Future Act of 2009 that would permit services provided by ancillary, or stand-alone, plans to satisfy the requirement for pediatric dental and vision services along with those integrated within medical plans.

The National Business Group on Health (Business Group) represents approximately 300, primarily large, employers who voluntarily provide health benefits and other health programs to over 55 million American employees, retirees, and their families.

The House Tri-Committee bill would require “qualified health benefits plans” to offer children’s oral and vision health services as part of the “essential benefits package” for medical plans, initially in exchanges, and, after five years, in the private market and employer-sponsored plans. The Senate Health, Education, Labor and Pensions (HELP) Committee’s bill has a similar requirement for individual and small group market plans.

While the health reform legislation would still permit stand-alone adult coverage, stand-alone family coverage for dental and vision benefits have proven the most cost effective. Many medical plans do not have relationships with dental and vision provider networks and would have to subcontract for these services just for children, which will increase premiums for dental and vision coverage. Medical plans are also likely to focus on health benefits rather than oral and vision care which may lead to benefits that are less robust than the benefits currently offered under stand alone plans.

Limiting the definition of qualified health plan for the delivery of pediatric vision and dental benefits to major medical plans will pull apart existing vision and dental benefits between parents and children for the 125 million Americans with stand-alone coverage. It would increase health care costs, reduce the number of adults receiving preventive oral and vision care and limit the benefit plan choices currently available to American families. To assure your goal of

## NATIONAL BUSINESS GROUP ON HEALTH

comprehensive dental and vision benefits for all, we urge you to approve amendments that would permit services provided by ancillary, or stand-alone, plans to satisfy the requirement for pediatric dental and vision services along with those integrated within medical plans.

Thank you for considering our recommendations. We look forward to working with you to ensure that comprehensive health care reform meets the oral health care and vision needs of America's families. Please contact me or Steven Wojcik, the Business Group's Vice President of Public Policy, at (202) 585-1812, if you would like to discuss them in more detail.

Sincerely,



Helen Darling  
President

cc:

The Honorable Mitch McConnell, Minority Leader, U.S. Senate  
The Honorable Max Baucus, Chair, U.S. Senate Committee on Finance  
The Honorable Charles Grassley, Ranking Member, U.S. Senate Committee on Finance  
The Honorable Tom Harkin, Chair, U.S. Senate Committee on Health, Education, Labor and Pensions Committee  
The Honorable Michael Enzi, Ranking Member, U.S. Senate Committee on Health, Education, Labor and Pensions Committee  
The Honorable Nancy Pelosi, Speaker, U.S. House of Representatives  
The Honorable John Boehner, Minority Leader, U.S. House of Representatives  
The Honorable Louise Slaughter, Chair, U.S. House Committee on Rules  
The Honorable David Dreier, Ranking Member, U.S. House Committee on Rules  
The Honorable Charles B. Rangel, Chair, U.S. House Committee on Ways and Means  
The Honorable Dave Camp, Ranking Member, U.S. House Committee on Ways and Means  
The Honorable Henry Waxman, Chair, U.S. House Committee on Energy and Commerce  
The Honorable Joe Barton, Ranking Member, U.S. House Committee on Energy and Commerce  
The Honorable George Miller, Chair, Ranking Member, U.S. House Committee on Education and Labor  
The Honorable Howard McKeon, Ranking Member, U.S. House Committee on Education and Labor