February 26, 2014

The Honorable Kathleen Sebelius  
Secretary  
Department of Health and Human Services  
200 Independence Ave, SW, Room 630-F  
Washington, DC 20201-0007

Dear Secretary Sebelius:

Thank you for your ongoing efforts to implement the Affordable Care Act (ACA). I am committed to working with the U.S. Department of Health and Human Services (HHS) to ensure all families with children have access to affordable pediatric dental benefits. I write to express my concerns with the proposed changes to the maximum out-of-pocket limit for pediatric dental services.

It is my understanding HHS recently contracted with NORC at the University of Chicago to analyze the impact of lowering the pediatric dental maximum out-of-pocket (MOOP) limit to remove the discrepancy in MOOPs between those offered as part of a Qualified Health Plan and those offered as a stand-alone dental product. The report concluded "a large decrease in the MOOP for stand-alone dental products will cause a significant increase in dental premium costs" and "from the consumer perspective, the least important factor in their purchasing decision (the MOOP) has been improved while the more important factors (premiums and deductibles/coinsurance) have worsened."

The timing of another change to pediatric dental plans and the evidence within the NORC report suggests many families and small businesses may face greater affordability challenges should the proposed rule be implemented in 2015. I support the goal of lowering the financial burden on families; however I am concerned about the unintended consequences of this proposal, including increasing premium rates.

I urge HHS to refrain from further modification to the pediatric dental MOOP until the 2016 plan year when the experience from this first year of coverage in 2014 can be reviewed and the impacts of benefit design on premiums are investigated further.

Stability in products is needed for consumers and small businesses while the ACA is fully implemented.

I supported the ACA, in part, because oral health is integral to overall health, and children should not suffer from preventable dental problems. A competitive dental
marketplace with affordable coverage options will ensure Alaskans have access to affordable dental benefits. Thank you for your attention to this matter.

Sincerely,

Mark Begich
United States Senator