

United States Senate

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The Honorable Kathleen Sebelius
Secretary
U.S. Department of Health and Human Services
The Hubert H. Humphrey Building
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Secretary Sebelius:

I write regarding potential changes to the maximum out-of-pocket limit for pediatric dental services (CMS-9954-P, Benefit and Payment Parameters for 2015). I have concerns about the impact of major changes for next year on consumers, especially since we have limited data to understand current experience trends.

I understand that a recent study has found that consumers are more concerned with lower premiums and deductibles/coinsurance. The report issued by NORC at the University of Chicago, commissioned by the U.S. Department of Health and Human Services (HHS), makes clear that lowering the pediatric dental maximum out-of-pocket (MOOP) limit will make dental coverage less affordable for a majority of consumers. Most significantly, 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."

Despite this conclusion, the proposed rule for 2015 significantly lowers the MOOP to \$300 for one child and \$400 for two children, down from \$700 and \$1400, respectively, for 2014. As a result, many Virginia families and small businesses may face greater affordability challenges should the proposed rule be implemented in 2015.

I urge HHS to postpone the implementation of any potential modifications to the pediatric dental MOOP limit until the 2016 plan year. This will allow any related rule proposed by the Centers for Medicare & Medicaid Services to accurately reflect the experience from this first year of coverage in 2014 and ensure the impacts of benefit design on premiums are investigated further.

I look forward to working with you to ensure all families with children have access to affordable pediatric dental benefits.

Sincerely,



Mark R. Warner
United States Senator