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of Dental Plans

April 21, 2020

The Honorable Mitch McConnell
Senate Majority Leader
United States Senate
Washington, DC 20510

The Honorable Charles Schumer
Senate Minority Leader
United States Senate
Washington, DC 20510

The Honorable Nancy Pelosi
Speaker of the House
U.S. House of Representatives
Washington, DC 20515

The Honorable Kevin McCarthy
House Minority Leader
U.S. House of Representatives
Washington, DC 20515

Dear Speaker Pelosi, Leader McConnell, Leader McCarthy, and Leader Schumer:

On behalf of the National Association of Dental Plans (NADP), we are grateful for the swift actions taken by Congress to respond to the novel coronavirus (COVID-19) pandemic and ensure that the nation’s health care system is equipped to ensure the safety of the public.

As the nation takes steps to address COVID-19, NADP is committed to assisting providers in the delivery of essential services and ensuring continuity of care in a safe manner for all dental consumers. During these unprecedented times, dental carriers are also providing enrollees with additional flexibilities, such as grace periods and premium relief. However, additional action by the federal government is needed to ensure that Americans maintain and improve their oral health. As Congress considers new legislation to address the dramatic impacts of the COVID-19, we ask you to protect the oral health of Americans by helping them maintain their access to dental coverage.

Good oral health care is associated with lower costs of treating other medical conditions, and dental benefits play a key role in promoting oral health. In a moment of extreme and extraordinary strain on our hospital systems, dental benefits carriers are helping guide enrollees to receive the dental care they need in the right setting and avoid seeking care in emergency rooms. When we emerge from this crisis and dental offices begin to reopen, it will be critical that Americans have access to their dental benefits to cover preventive and other oral health care that has been delayed.

We recommend that Congress take immediate action to help consumers maintain the dental coverage they need by implementing the following policies:

National Association of Dental Plans

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Provide Federal Subsidies for COBRA Premiums

In the last four weeks, the number of unemployment claims has reached more than 22 million and many Americans have lost or will lose their employer-sponsored coverage. As a result, these formerly employed individuals could become solely responsible for considerable out-of-pocket expenses associated with some critical dental treatments. While employees and their dependents may be eligible to continue employer-sponsored health insurance coverage under the provisions of the Consolidated Omnibus Budget Reconciliation Act (COBRA), for some the cost of COBRA coverage is considered unaffordable because the newly unemployed individual pays the entire cost of the insurance. For this reason, we recommend that **Congress provide temporary federal subsidization of COBRA premiums**. NADP urges Congress to consider taking actions like the measures implemented under the 2009 American Recovery and Reinvestment Act (ARRA) to help cover the cost of coverage for the newly unemployed during an unfortunate time of economic instability.

Implement a Special Enrollment Period in the Federal Exchange

Furthermore, NADP strongly encourages Congress to **direct CMS to implement a limited Special Enrollment Period (SEP) in the Federally Facilitated Exchanges (FFE)**. A SEP would allow those who do not currently have insurance to enroll in affordable medical and dental plans, shoring up coverage alongside employer and public plans. In the 11 states and DC with state-based exchanges, SEPs related to COVID-19 have enrolled thousands for the first time or because of lost coverage. It is critical that consumers have accessible options to seek private coverage, and without an SEP they may be left with limited choices during a public health emergency.

In addition to making coverage available on FFEs, Congress should also make it more affordable for consumers. For those individuals who have coverage in the individual market but who cannot make payments due to the crisis, Congress should reduce the required employee contribution percentage and provide temporary subsidies to help consumers to pay their medical and dental premiums.

NADP urges Congress to take immediate action to provide COBRA subsidies for employees and open a national special enrollment period. We believe that this approach will provide stability for working families help and avoid disruptions in continuity of care during this pandemic. We thank you for the opportunity to continue working with you during this national crisis. Please consider NADP a resource of information on the dental benefits industry and oral health.

Please contact Teresa Cagnolatti, Director of Government and Regulatory Affairs, with any questions regarding these comments at tcagnolatti@nadp.org or 972-458-6998 x111. Again, thank you for your consideration.

Sincerely,



Eme Augustini
Executive Director

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NADP Description:

NADP is the largest non-profit trade association focused exclusively on the dental benefits industry. NADP's members provide dental HMO, dental PPO, dental Indemnity and discount dental products to 200 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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