



Dental Intelligence

The Dental Industry’s “Keep Our Coverage” Campaign

While most assume the Affordable Care Act (ACA) impacts medical insurance only, members of the dental industry are keenly aware of the law’s potentially wide-ranging impacts on dental insurance, and the changes it could bring to the policies of millions of American families. To that end, the National Association of Dental Plans (NADP) has launched a digital advocacy campaign – KeepOurCoverage.com – to focus on the regulatory change that is critically needed to deliver on the promise made by the Administration that Americans can keep their current coverage, doctors, as well as dentists.

The ACA outlines specific benefits that must be included in all individual and small-group insurance policies. Those benefits are referred to as Essential Health Benefits (EHB), and contain pediatric services, including both **oral** and vision care, in addition to ambulatory patient services, emergency services, hospitalization and maternity care services. The initial HHS guidance on EHB benchmarks makes clear that pediatric oral services include the services typically offered under separate dental policies.

With dental services for children included in the required benefits package, the ACA makes clear that dental carriers can offer that coverage *inside* the newly defined state Exchanges. **Outside** the Exchanges, however, the law is unclear whether a medical carrier can omit dental in its package of essential health benefits to allow separate dental policies to meet EHB requirements **outside** the Exchange. This could disrupt the existing separate dental policies that cover as many as 22.9 million children through small employers (100 or fewer employees). Without clarification children would have their dental benefits provided by their medical policy who may not have the dentist they see today in their network. A NADP consumer survey indicates that as many as half of adults covered under small group policies may drop their own dental benefits if their children are separated from their own family coverage. This would lead to a net loss in Americans covered by dental benefits from implementation of the ACA. The dental industry is aggressively working to make sure regulators understand the need to make the rules surrounding how essential benefits are offered consistent both inside and outside the Exchanges to avoid disruption of care for children and keep adult coverage as well.

Due to the disruption to consumers, there is an abundance of Congressional support, led by Democratic Senators to clarify this issue in regulations. In addition, stakeholders, such as the U.S. Chamber of Commerce, also support NADP's request.

These facts are clear; most Americans purchase or receive dental benefits through their place of work separately from medical coverage. Looking at the entire dental marketplace, 99% of all dental policies in force today are separate from medical coverage. Of these separate policies 43.7 million employees and dependents with dental coverage through 1.65 million small businesses become vulnerable to disruption should HHS fail to clarify the rules prior to when Exchanges become effective in 2014. HHS has the authority to issue updated regulations to ensure fair competition between all health and dental plans for pediatric dental benefits. Americans should expect regulators to meet this responsibility and fill the gaps in the ACA's statutory language in a timely manner. We cannot risk the oral health of our children or their relationships with their family dentist just because there is bureaucratic uncertainty.

In effect, this issue calls into question the Administration's promise that Americans can keep their current coverage and doctors if they like the coverage that they already have. Regulatory clarity is the missing link to protect consumer access to the dental plans they now enjoy.

The dental benefit industry has provided regulators with commonsense policy recommendations for offering standalone dental policies both inside and outside the Exchanges. The industry remains committed to ensuring that consumers can continue to choose from a variety of affordable, high-quality dental policies. It's now up to the administration to keep its promise and deliver on the reforms they pledged would expand coverage and make Americans healthier. Action is needed now to avoid confusing and painful disruption of dental benefits service.

Visit KeepOurCoverage.com for more information.

For more about the article series or NADP, visit nadp.org or contact Director of Membership and Communications Rene Chapin at 972-458-6998, etc. 110.

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