

August 26, 2014

The Honorable Sylvia Mathews Burwell  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Secretary Burwell:

Congratulations on your confirmation as Secretary of Health and Human Services (HHS). As you transition into your new role, the undersigned group of oral health stakeholders urges you to make the necessary technical changes to the Federally Facilitated Marketplace (FFM) to allow individuals, families, and small groups to directly purchase dental plans and increase access to oral health coverage for millions of Americans.

Dental disease is nearly 100 percent preventable and yet today a quarter of all Americans are unable to afford basic oral care. In 2012, the country spent \$111 billion on oral care; roughly the same amount spent on treating all cancers combined. Financial barriers to oral care are significant for many low-income Americans, resulting in more than 31 million low-income people without access to needed oral care. Coverage diminishes these barriers significantly. Those with dental benefits are 50 percent more likely to seek oral care than those who do not have coverage. Ensuring people have access to coverage will help increase the proportion of children, adolescents, and adults who use the oral health care system—a leading health indicator and key goal of the Healthy People 2020 initiative.

Some state-based marketplaces (SBMs) have already taken an important step in promoting dental coverage and improving oral health. These SBMs allow individuals and small groups to purchase dental plans regardless of whether they first purchase a medical plan. This means that individuals and families— who already have medical coverage through an employer or some other program – are able to use SBM tools to compare dental plan offerings and directly purchase a dental plan that meets their unique needs.

Unfortunately, the FFM does not afford individuals and families the same access to dental coverage. On the FFM, individuals only have access to a dental plan if they first purchase a medical plan.

Based on HHS’s own data, about 1.1 million people who first purchased a medical plan through the FFM also purchased a standalone dental plan. Of the 1.1 million, roughly 34 percent were young adults. This is a significant statistic considering that adult dental benefits (for those 19 or older) are optional benefits and subsidies are generally not available to help cover the cost of a standalone dental plan. These numbers illustrate the value consumers – including “young invincibles” – place on dental coverage. As it stands now, the FFM is missing an opportunity to connect people with coverage and draw more consumers to the Marketplace.

Dental carriers have communicated with CCIIO directly about this issue but unfortunately, while CCIIO staff understands the importance of supporting consumer access to oral health care, this barrier to the direct purchase of dental coverage persists. We cannot successfully address the oral health crisis in this country, and make progress on our commitment to achieving the goals of Healthy People 2020, unless we make oral health care a priority.

**The undersigned organizations – representing a wide range of the oral health community – urge you to make the necessary technical changes now to allow individuals and families to shop for dental coverage directly through the FFM in 2015.**

Thank you for your attention to this important issue.

Sincerely,

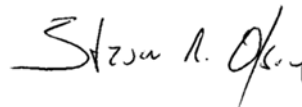


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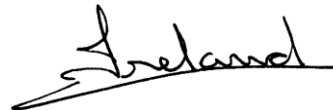
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