

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
Center for Consumer Information and Insurance Oversight
200 Independence Avenue SW
Washington, DC 20201



January 21, 2021

Dear Dental Association Member:

As we look forward to the 2022 coverage year, I know that many stand-alone dental plan (SADP) issuers are contemplating participating or continuing their participation in the Health Insurance Exchanges established under the Patient Protection and Affordable Care Act (PPACA). In particular, SADPs are specifically permitted to participate in the Exchanges to provide coverage for the pediatric dental services that are a part of the essential health benefits (EHB). The PPACA¹ permits medical qualified health plans (QHP) to be treated as QHPs that meet the obligation to cover EHB without providing coverage of the pediatric dental EHB when the medical QHP is offered through an Exchange in which an SADP that covers the pediatric dental EHB also is offered.

In order to allow medical QHP issuers to exercise the statutory option to offer QHPs through the Exchanges that do not offer the pediatric dental EHB, the Center for Consumer Information and Insurance Oversight (CCIIO) for the last eight years has implemented a voluntary reporting process² for interested SADP issuers to communicate their intent to seek certification of SADPs to be offered through one or more Federally-facilitated Exchanges (FEEs), including Exchanges where States perform plan management functions. This year's process is very similar process to that implemented for the 2014-2021 coverage years, which was well received by both medical QHP and SADP issuers. The accompanying voluntary reporting template allows interested SADP issuers to identify the Exchanges in which they intend to seek certification for SADPs by state, market (individual or group), and service area. Additionally, for the 2022 plan year, we are also asking SADP issuers to specify the counties in which they intend to offer SADPs and also indicate if the offerings are on- or off-Exchange.

¹ Section 1302(b)(4)(F) of the Patient Protection and Affordable Care Act.

² The voluntary reporting process was established in the rule Patient Protection and Affordable Care Act; Data Collection to Support Standards Related to Essential Health Benefits: Recognition of Entities for the Accreditation of Qualified Health Plans (77 Fed. Reg. 42,658 (Jul.20, 2012)), available at: <http://www.gpo.gov/fdsys/pkg/FR-2012-07-20/pdf/2012-17831.pdf>, and the reporting data elements were included in CMS-10448: Notice of Intent to Provide Dental Coverage in the Exchange; OMB Control Number: 0938-1174 (August 28, 2015), available at: https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201710-0938-009.

Although the voluntary reporting program is not legally binding, we encourage SADP issuers to list those areas where there is an intent to offer an SADP in an Exchange, as medical QHP issuers may seek certification of health plans that do not cover the pediatric dental EHB based on this report. In order to formally offer coverage through an Exchange, SADP issuers will need to submit certification applications and receive certification for their plans.

The National Association of Dental Plans (NADP) and Delta Dental Plans Association (DDPA) are one of the channels of communication for this voluntary reporting program. Interested issuers of SADPs can report this information through the NADP or DDPA, which will transmit these data to CCIIO. CCIIO is interested primarily in the data that will inform health insurance issuers submitting medical QHP certification applications to the FFEs, but NADP or DDPA may choose to share this data with interested State-based Exchanges or medical QHP issuers directly.

As part of this process, we encourage all interested SADP issuers to complete and return the attached data template to their contact at the NADP or DDPA by February 15, 2021, with the understanding that their data will be transmitted to CCIIO. SADP issuers may also submit their data directly to CCIIO by sending the completed data template to dental@cms.hhs.gov.

We appreciate your interest in participating in the Health Insurance Exchanges. If you have any additional questions please contact CCIIO's Marketplace Plan Management Group at dental@cms.hhs.gov.

Sincerely,

Lourdes Grindal Miller

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