

July 22, 2021

The Honorable Patty Murray  
Chair, Committee on Health, Education, Labor, and Pensions  
U.S. Senate  
154 Russell Senate Office Building  
Washington, DC 20510

The Honorable Frank Pallone  
Chair, Committee on Energy and Commerce  
U.S. House of Representatives  
2125 Rayburn House Office Building  
Washington, DC 20515

Dear Chairs Murray and Pallone:

On behalf of our 162,000 members, the American Dental Association (ADA) would like to take this opportunity to respond to your letter requesting information on design considerations for legislation to develop a public health insurance option.<sup>1</sup>

The ADA supports directing the Center for Consumer Information and Insurance Oversight (CCIIO) to first conduct a comprehensive study on the impact of covering additional services in a public health insurance option, such as inclusion of dental care benefits. The study should examine the impact of benefits and the costs to beneficiaries.

Additionally, the ADA is currently in the process of debating our policy on a public health insurance option and suggest the following be taken into consideration for its design:

- Dental coverage should be available to consumers through Stand Alone Dental Plans;
- Diagnostic and preventive dental services embedded within Qualified Health Plans should be covered without any additional co-payment, co-insurance or deductibles;
- Individuals seeking to purchase benefits in the Marketplaces must be able to purchase dental benefits without having to first purchase a medical plan;
- Plan designs should remain flexible and offer consumers adequate choices balancing cost and benefit value;
- Dental Plans offered in the Marketplaces must be required to transparently report Dental Loss Ratios (DLR);
- Cost sharing assistance or premium tax credits should be available to consumers purchasing dental plans; and,
- If a public option plan that includes pediatric or adult dental benefit plans were introduced within the Marketplaces, then such plans should:
  - Allow freedom of choice for patients to seek care from any dentist while continuing to receive the full program benefit;

---


<sup>1</sup> [U.S. Senate Committee on Health, Education, Labor and Pensions](#), May 26, 2021.

July 20, 2021  
Page 2

- Not force any providers including those already participating in existing public programs to join a Marketplace plan network and instead should support fair market competition including meaningful negotiation of contracts and annual adjustment of fee schedules; and,
- Only include minimal and reasonable administrative requirements to promote participation and provide meaningful access.

We would welcome the opportunity to meet with you to discuss how we can work together. If you have any questions, please contact Ms. Natalie Hales at 202-898-2404 or [halesn@ada.org](mailto:halesn@ada.org).

Sincerely,



Daniel J. Klemmedson, D.D.S., M.D.  
President



Kathleen T. O'Loughlin, D.M.D., M.P.H.  
Executive Director

DJK:KTO:dnl