



March 10, 2026

Dear CMS Administrator Oz:

On behalf of our future patients, the American Student Dental Association (ASDA) does not support reinstating the prohibition on adult dental services as an essential health benefit. Oral health is integral to overall health and well-being. We must help address longstanding gaps in oral healthcare coverage for adults across the nation. That is why we support including dental coverage as an “Essential Health Benefit” or EHB option for both children and adults inside and outside of Marketplace plans. We ask that CMS preserve a state’s flexibility to choose to include oral health as an essential health benefit for adults.

Patients who use the ACA Marketplace are often individuals more likely to forego dental care when they hit their annual maximum. When adult dental services are included as an EHB, states can support more comprehensive coverage options and help ensure key Marketplace consumer protections apply, improving affordability and reducing fragmentation in coverage for patients. Preserving this flexibility can also strengthen plan accountability and transparency, including through medical loss ratio (MLR) standards that help ensure premium dollars support patient care.

The decision to include adults was done with a diligent review of extensive stakeholder feedback, including from the American Dental Association. Prohibiting states’ ability to include adult dental as an essential health benefit would go against broader goals to foster greater competition, lower overall health care costs, and reduce fragmentation in healthcare for consumers.

Please do not prohibit states from including adult dental benefits as an EHB for qualified health plans.

A handwritten signature in black ink that reads 'Honesty Boone'.

Honesty Boone

President, American Student Dental Association