

Letter Number 2024-01

Date: March 29, 2024

Dental Plans [X]

Vision Plans [X]

Subject: 2025 Federal Employees Dental and Vision Insurance Program Call Letter

Submission Of Proposals

This is our annual call for benefit and rate proposals from Federal Employees Dental and Vision Insurance Program (FEDVIP) Carriers. This letter sets forth OPM's policy goals and initiatives for FEDVIP for Plan Year 2025. You must submit your benefit and rate proposals on or before May 31, 2024. We will not accept benefit proposals received after May 31, 2024. However, we will accept proposals related to the annual Current Dental Terminology (CDT) update on or before August 15, 2024. All dental and vision brochure updates must be completed on or before August 30, 2024. OPM expects to complete all benefit and rate negotiations no later than mid-August 2024 to ensure meeting open enrollment timelines. Guidance and policy from previous Carrier Letters remain in effect unless superseded.

FEDVIP Program Updates

Current Dental Terminology in Carrier Brochures

FEDVIP abides by the CDT codification system in accordance with the standards set by the American Dental Association (ADA). Carrier brochures must align with these standards, meaning the brochure CDT codes must be unaltered and reflect the exact nomenclature provided by the ADA. For example, the ADA CDT code "D0272 bitewings – two radiographic images" cannot be changed to "D0272 bitewings – 2 films" or any similar variation.

The codes must mirror the ADA's CDT list exactly. Please ensure that all necessary edits to the brochure are completed prior to August 30, 2024, to ensure compliance with the ADA.

Missing Tooth Clause

The current FEDVIP Carrier Application has a clause under the subsection Benefits and Limitations for Prosthodontic Services which states, "Services or treatments for the provision of an initial prosthodontic appliance (i.e., fixed bridge restoration, implants, removable partial or complete denture, etc.) when it replaces natural teeth, extracted or missing, including congenital defects, prior to Effective Date of Coverage may not be eligible for coverage," which is also known as a Missing Tooth Clause.¹ FEDVIP encourages dental Carriers that utilize this Missing Tooth Clause to remove this as a benefit limitation. Dental reconstruction is a valuable benefit for individuals with missing teeth to improve masticatory function and speech, and OPM's goal is to expand coverage options for covered individuals to ensure their access to dental reconstruction.

The Relationship between Oral Health and General Health

Oral health status can significantly affect other aspects of an individual's health, including cardiovascular, respiratory, and mental health, as well as pregnancy.^{2,3,4,5} The reverse is also true, resulting in a cyclical health response: poor general health can also negatively affect oral health, which can exacerbate general health conditions. This is seen with obesity, diabetes, and osteoporosis.^{2,3,5}

Oral health management is fundamental to the management of general health, as there is an association between people with good oral health and

¹ United States Office of Personnel Management Federal Employees Dental and Vision Insurance Program (FEDVIP) Application to Participate as a Qualified Company Under the Federal Employees Dental and Vision Benefits Enhancement Act of 2004, 5 U.S.C. Chapters 89A and 89B. pp C64. <https://sam.gov/opp/f3ffb8eebb74482aa646d3711c37d134/view>

² Mayo Clinic. (2021). *Oral health: A window to your overall health*. <https://www.mayoclinic.org/healthy-lifestyle/adult-health/in-depth/dental/art-20047475>

³ Cleveland Clinic. (2022). *How your oral health affects your overall health*. <https://health.clevelandclinic.org/oral-health-body-connection/>

⁴ Cleveland Clinic. (2022). *The link between dental health and mental health: what you need to know*. <https://health.clevelandclinic.org/link-between-dental-health-and-mental-health>

⁵ National Institutes of Health. (2021). *Oral Health in America: Advances and Challenges*. US Department of Health and Human Services, National Institute of Dental and Craniofacial Research. <https://www.nidcr.nih.gov/research/oralhealthinamerica>

fewer adverse health effects when compared to their peers with poor oral health.⁵ OPM encourages all dental Carriers to make readily available educational resources devoted to oral hygiene, disease prevention, and the correlation between oral health and general health, via webpage or written materials to be mailed to an individual upon request.

Fraud, Waste, and Abuse

Carriers are responsible for preventing, detecting, investigating, and reporting instances of fraud, waste, and abuse (FWA) within FEDVIP. Carriers and employing offices share the responsibility to ensure family member eligibility, recognizing that coverage of ineligible family members leads to improper payments, including erroneous or fraudulent claims.

Cost Transparency

Additionally, OPM remains strongly committed to transparency and the provision of cost-effective care to FEDVIP members. The Enhanced CDT Tool provides FEDVIP members with information necessary to understand their potential out-of-pocket costs prior to undergoing a common dental procedure. OPM will continue to work with the dental Carriers and FedPoint, the BENEFEDS contractor, to update the Enhanced CDT Tool on an annual basis to ensure continued transparency for FEDVIP members. We appreciate your work with FedPoint to update the Enhanced CDT Tool and thank you for your efforts.

Cybersecurity

White House Executive Order 14028 states that the prevention, detection, assessment, and remediation of cyber incidents is a top priority and essential to national and economic security. Under this Executive Order, all Federal agencies, including OPM, implemented phishing-resistant multi-factor authentication. Multi-factor authentication and similar security protections will continue to be a major focus in coming years for both OPM and our contractors. Agency goals include improving the Federal government's investigative and remediation capabilities related to cybersecurity incidents (OMB M-21-31) and implementation of Zero Trust

Architecture (OMB M-22-09). We ask for Carriers' continued cooperation with these efforts.

FEDVIP Carriers must report to OPM incidents and breaches as required by their contract with OPM. The OPM PII Reporting Template Form 5084 must be emailed to CyberSolutions@opm.gov and to the contracting officer immediately upon becoming aware of the risk. The program manager and your respective program analyst must be copied on this email. An incident or breach must be reported as required by the contract even if it is believed to be limited, small, or insignificant.

Disaster Guidance

In the event of a natural disaster, OPM's guidance is to extend flexibility in providing benefits. Please provide your plans for members and any disaster recovery plans for your organization.

Conclusion

OPM's goal for the FEDVIP Program is to provide quality, affordable dental and vision benefits for Federal employees, annuitants, their family members, and other eligible persons and groups. Continuous open and effective communication between OPM staff and FEDVIP Carriers should occur to ensure an efficient negotiation cycle. Please discuss all proposed benefit changes with your program analyst as you formulate your proposal.

We look forward to the negotiations for the upcoming contract year. Thank you for your continued commitment to the Federal Employees Dental and Vision Insurance Program.

Sincerely,

Laurie Bodenheimer
Associate Director
Healthcare and Insurance