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**Executive Director** 

AAOMS.org

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The Honorable Peter Roskam
Chair, House Ways and Means Subcommittee
on Health
2246 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Sander Levin
Ranking Member, House Ways and Means
Subcommittee on Health
1236 Longworth House Office Building
Washington, D.C. 20515

Dear Chairman Roskam and Ranking Member Levin:

On behalf of the American Association of Oral and Maxillofacial Surgeons (AAOMS), the professional organization that represents 9,500 oral and maxillofacial surgeons (OMSs) in the United States, I would like to thank you for your leadership in identifying ways to lower healthcare costs by holding the June 6th Subcommittee hearing titled, "Lowering Costs and Expanding Access to Health Care through Consumer-Directed Health Plans." The issue is important to OMSs since many of our patients often rely on consumer-directed health plans, such as Flexible Spending Accounts (FSAs), to help them afford the treatment they need.

Current restrictions stemming from the ACA established a federal cap on FSA contributions at \$2,500 – with an annual inflation adjustment – which was half of the \$5,000 limit that most employers allowed prior to the adoption of the ACA. Out-of-pocket costs for medical insurance alone easily exceed the current \$2,650 annual FSA cap. With the rise in cost of deductibles, co-pays and prescription drug medications, Americans are paying more for their healthcare. According to the 2017 Milliman Medical Index, consumers spent an average of \$4,535 for out-of-pocket healthcare expenses in 2017. This is significantly more than what consumers are able to save through FSAs.

FSAs also help patients afford dental care. Oral health is increasingly recognized as being tied to a patient's overall health and well-being; however, health insurance does not cover most dental procedures and many Americans do not have access to dental insurance. Even for those who do, dental insurance only covers a fraction of the cost of many common and necessary dental procedures, like dental implants, orthodontia, root canals or extractions of abscessed teeth. As a result, families rely often on the tax-free savings from FSAs in order to help them save for these types of procedures. With the existing restrictions on FSA contributions, some patients are forced to forgo necessary dental care.

<sup>&</sup>lt;sup>1</sup> Girod C, Hart S, Weltz S. 2017 Milliman Medical Index. Milliman, Inc. 2017: 3-15.

The Responsible Additions and Increases to Sustain Employee Health Benefits Act of 2017, or RAISE Act (HR 1204), would provide relief to families by raising the cap to \$5,000 and allowing families with more than two dependents to set aside an additional \$500 beyond the savings cap for each dependent. Finally, it would help families prepare for expected and unanticipated healthcare costs by carrying over unused funds and eliminating the IRS's onerous "use it or lose it rule."

AAOMS encourages the Subcommittee to take up the RAISE Act (HR 1204) as it evaluates ways to lower healthcare costs through consumer-directed plans. FSAs enable consumers to make better healthcare decisions and control their healthcare costs. We welcome an opportunity to discuss this issue in greater detail and work with you and your Committee to increase the contribution limits to FSAs. Please contact Jeanne Tuerk, manager of the AAOMS Department of Governmental Affairs, at 800-822-6637 or jtuerk@aaoms.org for additional information.

Sincerely,

Brett L. Ferguson, DDS, FACS

**AAOMS President** 

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