



*For Immediate Release
July 17, 2024*

Statement on Proposed Medicare Payment Clarification for Medically Necessary Oral and Dental Health Services

It is well-established that overall health is inextricably linked to oral health. Nevertheless, dental care has long been inaccessible to millions of Medicare beneficiaries, leading to an alarming situation in which two-thirds of older Americans have periodontal disease and one-fifth have lost all of their teeth. Untreated oral conditions significantly increase beneficiaries' risk of suffering chronic conditions, resulting in impaired well-being, shorter lives, and higher Medicare costs. Therefore, the Consortium welcomes the proposed Medicare Physician Fee Schedule for 2025, which aims to take another important step for Medicare beneficiaries and oral-systemic health.

In the past two years, the Centers for Medicare and Medicaid Services (CMS) have taken historic steps to clarify that Medicare payment is available for dental services that are inextricably linked to and substantially related and integral to the clinical success of certain Medicare-covered medical services. Among these medical services are organ and stem cell transplant surgery, cardiac valve replacement, valvuloplasty procedures, head and neck cancer treatment, as well as chemotherapy, chimeric antigen receptor (CAR) T-cell therapy, and high-dose bone-modifying agents when used in the treatment of cancer.

Importantly, CMS also established an annual process by which stakeholders may nominate other covered medical services for which clinical evidence demonstrates that dental care is inextricably linked and substantially related and integral to their clinical success. In the subsequent years, CMS has formally considered nominations spanning a broad range of medical conditions and Medicare-covered medical services, including for autoimmune disease, diabetes mellitus, and End-Stage Renal Disease (ESRD).

In the proposed Physician Fee Schedule for 2025, CMS proposes clarification of payment for dental services that are inextricably linked to dialysis services received by beneficiaries with ESRD. In addition, CMS provides a series of targeted information requests relating to autoimmune disease and diabetes, among other conditions, for potential inclusion in forthcoming Physician Fee Schedules. CMS also explains its decision making process and the information on which it relies in considering current and future nominations.

The Consortium is pleased to express our gratitude to the Biden Administration and the exemplary team at CMS, as well as the many Members of Congress who actively urged CMS to further define the Medicare program's payment of medically necessary oral and dental services. Simply put, the efforts taken by these leaders to elucidate Medicare payment policy for medically necessary oral and dental care will have a direct and meaningful impact in the lives of millions of beneficiaries and their families.

“By recognizing Medicare payment of medically necessary dental care for beneficiaries who receive dialysis services to treat End-Stage Renal Disease, CMS is meaningfully continuing its vital efforts to improve patient health outcomes and reduce costs,” said Jeffrey Silberzweig, MD, Chief Medical Officer of The Rogosin Institute, Professor of Clinical Medicine at Weill Cornell Medical College, Medical Director for Dialysis Services at New York-Presbyterian Hospital/Weill Cornell and Lower Manhattan Hospitals, and Co-Chair of the American Society of Nephrology's COVID-19 and Other Emerging Threats Workgroup. “More than half a million beneficiaries receive dialysis for ESRD today, and CMS' proposal will help ensure they have access to the medically necessary oral care they need.”

“We applaud this enhanced clarification of Medicare payment policy and the progress made towards more equitable health care for people who rely on Medicare for their health insurance,” said Baliey Reavis, Manager of Federal Relations for Families USA. “In this rule, CMS once again demonstrates its sensitivity to stakeholders' input, and the enhanced guidance it provides will be of tremendous help as further payment clarification is sought in the years ahead.”

Sharing the conviction that Medicare and its beneficiaries should not be without the vital clinical and fiscal benefits of medically necessary oral and dental care, more than 240 leading organizations have joined as signatories of the Consortium's Community Statement. The Statement urges the Administration and Congress to explore options for extending evidence-based treatment to all Medicare beneficiaries.

“For decades, Medicare beneficiaries suffered due to a lack of access to medically necessary dental care,” said Center for Medicare Advocacy Founder and Executive Director Judith Stein. “Thanks to the evidence-based action the Medicare program continues to take, we continue to move closer to a future of better health, improved quality of life, and greater program equity.”

The Consortium will once again engage in the rulemaking process as we work to secure adoption of CMS' proposal, support the Administration as it formalizes and implements this policy, and develop the information requested for diabetes and autoimmune disease, thanks to the very helpful detailed clarification of research and data needed for these two conditions.

The signatories of the Consortium's Community Statement are listed below:

AARP
 ABLE NH (Advocates Building Lasting Equality in NH)
 ACA Consumer Advocacy
 Acuity Specialists
 Adenoid Cystic Carcinoma Research Foundation
 AIDS Foundation of Chicago
 Alliance for Retired Americans
 Allies for Independence
 ALS Association
 American Academy of Developmental Medicine and Dentistry
 American Academy of Nursing
 American Academy of Oral Medicine
 American Academy of Oral Systemic Health
 American Academy of Periodontology
 American Association for Community Dental Programs
 American Association for Dental, Oral, and Craniofacial Research
 American Association of Clinical Endocrinologists
 American Association of Colleges of Nursing
 American Association of Diabetes Educators
 American Association of Hip and Knee Surgeons
 American Association of Kidney Patients
 American Association of Nurse Practitioners
 American Association of Public Health Dentistry
 American Association on Health and Disability
 American Autoimmune Related Diseases Association
 American College of Cardiology
 American College of Emergency Physicians
 American College of Gastroenterology
 American College of Physicians
 American College of Rheumatology
 American Dental Assistants Association
 American Dental Education Association
 American Dental Hygienists' Association
 American Diabetes Association
 American Geriatrics Society
 American Head and Neck Society
 American Heart Association
 American Institute of Dental Public Health
 American Kidney Fund
 American Liver Foundation
 American Medical Association
 American Muslim Health Professionals (AMHP)
 American Nephrology Nurses' Association
 American Network of Oral Health Coalitions
 American Nurses Association
 American Parkinson Disease Association
 American Psychiatric Association
 American Psychiatric Nurses Association
 American Public Health Association
 American Society for Radiation Oncology
 American Society of Clinical Oncology
 American Society of Nephrology
 American Society of Transplant Surgeons
 American Society of Transplantation
 American Thoracic Society
 Arcora Foundation
 Arizona Oral Health Coalition
 Arthritis Foundation
 Association of Asian Pacific Community Health Organizations
 Association of Community Cancer Centers
 Association of Oncology Social Work
 Association of State and Territorial Dental Directors
 Autistic Self Advocacy Network
 Be a Hero
 Brain Injury Association of America
 California Dental Association
 California Medical Association
 CareQuest Institute for Oral Health
 Carlson Foley Enterprises
 Catholic Health Association of the United States
 Center for Advocacy for the Rights and Interests of the Elderly
 Center for Elder Law & Justice
 Center for Health Law and Policy Innovation
 Center for Medicare Advocacy
 Center for Popular Democracy
 Champaign County Health Care Consumers
 Children's Dental Health Project
 Coalition for Oral Health for the Aging
 Coalition of Texans with Disabilities
 Colgate Palmolive Company
 Colorado Consumer Health Initiative
 Community Catalyst
 Community Dental Health NPO
 Connecticut Oral Health Initiative
 Cornerstone Dental Specialties
 Crohn's and Colitis Foundation of America
 Culpeper Wellness Foundation
 Davis Phinney Foundation for Parkinson's
 Delaware Dental Hygienists' Association
 Dental Lifeline Network
 Dental Trade Alliance
 Dentsply Sirona
 Dialysis Patient Citizens
 Dientes Community Dental Care
 Disability Rights Education and Defense Fund
 Eating Disorders Coalition
 Elderly Housing Development & Operations Corporation
 Epilepsy Foundation
 EXCELth, Inc.
 Families USA
 504HealthNet
 Florida Health Justice Project
 Georgia AIDS Coalition
 Georgians for a Healthy Future
 Gerontological Advanced Practice Nurses Association
 GLMA: Health Professionals Advancing LGBTQ Equality
 Haleon
 Hartford Institute for Geriatric Nursing
 Hawaii Oral Health Coalition
 Hawaii Children's Action Network Speaks!
 Head and Neck Cancer Alliance
 Health Care For All (MA)
 Health Care Is a Human Right WA
 Health Care Voices
 Healthy Living and Learning Center
 Heartland Alliance
 Henry Schein Cares Foundation
 HIV Medicine Association
 Hispanic Dental Association
 International Pemphigus and Pemphigoid Foundation
 Island Liaison, Inc.
 John A. Hartford Foundation
 Jon C Burr Foundation
 Justice in Aging
 Kentucky Oral Health Coalition
 Klamath Basin Oral Health Coalition

Lakeshore Foundation
 Leukemia and Lymphoma Society
 Louisiana Primary Care Association
 Lupus and Allied Diseases Association, Inc.
 Lupus Foundation of America
 Maryland Dental Action Coalition
 Massachusetts ME/CFS and FM Assoc
 Medicaid|Medicare|CHIP Services Dental Association
 Medicare Rights Center
 Mended Hearts
 Mental Health America
 Metro New York Health Care for All
 Michigan Primary Care Association
 Minnesota Dental Therapy Association
 myNEXUS
 National Alliance of State & Territorial AIDS Directors
 National Alliance on Mental Illness
 National Association of Area Agencies on Aging
 National Association of Chronic Disease Directors
 National Association of Community Health Centers
 National Association of Dental Plans
 National Association of Hispanic Nurses
 National Association of Nutrition and Aging Services Programs
 National Association of Social Workers
 National Association of States United for Aging
 and Disabilities
 National Coalition of Dentists for Health Equity
 National Comprehensive Cancer Network
 National Committee to Preserve Social Security
 and Medicare
 National Consumer Voice for Quality Long-Term Care
 National Consumers League
 National Council for Behavioral Health
 National Council on Aging
 National Dental Association
 National Forum for Heart Disease and Stroke Prevention
 National Hispanic Medical Association
 National Health Law Program
 National Interprofessional Initiative on Oral Health
 National Kidney Foundation
 National League for Nursing
 National Medical Association
 National Multiple Sclerosis Society
 National Network for Oral Health Access
 National Osteoporosis Foundation
 National Rural Health Association
 National Stroke Association
 North American Transplant Coordinators Organization
 Northwest Harvest
 Nurses for America
 Nursing Interventions for Health System Elders
 NYU Rory Meyers College of Nursing
 Ohio Alliance for Retired Americans Educational Fund
 Oklahoma Policy Institute
 Oncology Nursing Society
 Oral Cancer Foundation
 Oral Health Kansas
 Oral Health Nursing Education and Practice Program
 Oral Health Ohio
 Oral Health Progress and Equity Network (OPEN)
 Our Mother's Voice
 PA Coalition for Oral Health
 Pacific Dental Services Foundation
 Parkinson's Foundation
 Patient-Centered Primary Care Collaborative
 Pennsylvania Health Access Network
 PEW Dental Campaign
 Piedmont Regional Dental Clinic
 PRC
 Preventive Cardiovascular Nurses Association
 Pride At Work - WA North, Mt. Kulshan Chapter
 Procter & Gamble
 ProHEALTH Dental
 Project Accessible Oral Health
 Puget Sound Advocates for Retirement Action (PSARA)
 Renal Healthcare Association
 Renal Physicians Association
 Research!America
 Santa Fe Group
 School-Based Health Alliance
 Scleroderma Foundation
 Senior Charity Care Foundation
 Senior Mobile Dental
 Sepsis Alliance
 Sjögren's Foundation
 Smiles To Go, LLC
 Social Security Works
 Society for Transplant Social Workers
 Special Care Dentistry Association
 Statewide Poverty Action Network
 Support for People with Oral and Head and Neck Cancer
 Texas Oral Health Coalition, Inc
 Texas Parent to Parent
 The AIDS Institute
 The Arc of the United States
 The Bingham Program
 The CornerStone Community Development Center
 The Gerontological Society of America
 The Michael J. Fox Foundation
 The National Forum of ESRD Networks
 The Society for Thoracic Surgeons
 The TMJ Association
 Third Way
 Tri-Area Community Health
 Trust for America's Health
 United Health Organization
 United Network for Organ Sharing
 UUFHCT
 Virginia Community Healthcare Association
 Virginia Health Catalyst
 Virginia Organizing
 Virginia Rural Health Association
 Washington Healthcare Access Alliance
 Wayne County Oral Health Organization
 Wesley Living Woodland Homes
 West Central Initiative
 Western Center on Law and Poverty
 Winters Elder Day Council
 WomenHeart, The National Coalition for Women
 with Heart Disease