



September 6, 2022

Honorable Chiquita Brooks-LaSure  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attention: CMS-1770-P  
P.O. Box 8016  
Baltimore, MD 21244-8016

Re: CMS-1770-P (Section II.L.)

Administrator Chiquita Brooks-LaSure:

The American Public Health Association (APHA) is pleased to provide the Centers for Medicare & Medicaid Services (CMS) comments on the proposals and request for information on Medicare Parts A and B Payment for Dental (Section II.L.) in the proposed rule on Medicare and Medicaid Programs: CY2023 Payment Policies under the Physician Fee Schedule and Other Changes to Part B Payment Policies, Medicare Shared Savings Program Requirements, etc. (CMS-1770-P).

APHA works to ensure the right to health and health care, achieve health equity, and build public health infrastructure, which drives our support for Centers for Medicare & Medicaid Services' plan for adding additional dental services as medically integral and necessary covered medical services. The American Public Health Association has expressed the need for a broader definition of medically necessary dental services in the 2020 APHA policy statement, [A Call for Adult Dental Benefits in Medicaid and Medicare](#), due to our understanding of oral health being essential for overall health and wellbeing. With 42% of older adults reporting oral symptoms associated with severe periodontitis, tooth loss, or unaddressed caries<sup>1</sup> and about 80% having at least one chronic health condition,<sup>2</sup> it is .00000912 0 61



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codify additional payment policies and methods to improve uptake of services and  
improve health outcomes.**

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**further clinical scenarios that meet th**

Oral health is an integral part of overall health. The American Public Health Association appreciates the opportunity to provide comments about these proposed rules. If finalized, the proposed rules will make a considerable difference for our nation's older adults and people with disabilities who are struggling to afford and access the oral health care they need to stay healthy. We are grateful to Administrative officials, the scores of advocates, and Members of Congress, who have worked for years to get us to this point.

Sincerely,

Georges C. Benjamin, MD