

September 8, 2021

Natalia Chalmers, DDS, MHSc, PhD
Chief Dental Officer
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Dear Dr. Chalmers:

On behalf of our 162,000 members, the American Dental Association (ADA) would like to congratulate you on your recent appointment as the first-ever Chief Dental Officer in the Office of the Administrator. Leveraging your leadership in the dental profession and past experience as Dental Officer at the U.S. Food and Drug Administration, the Centers for Medicare and Medicaid Services (CMS) is well-positioned to tackle the most serious issues in oral health care today.

We look forward to working with you on the following areas:

- Improving the Medicaid program, including expanding the participation of dentists through:
 - Requiring the CMS Center for Program Integrity to issue guidance to state Medicaid agencies (SMAs) concerning best practices in dental audits and developing standardized training for dental auditors;
 - Providing guidance to SMAs to streamline dentist credentialing by utilizing the ADA Council for Affordable Quality Healthcare (CAQH) credentialing service or equivalent;
 - Establishing the benchmark floor for all Medicaid dental fees at 75th percentile of regional dental fees based on ADA survey data; and
 - Working to enhance consistent adult dental benefits across all Medicaid programs.
- Partnering with the dental community to establish an appropriate Healthcare Common Procedural Coding System (HCPCS) billing code to help address ongoing challenges regarding access to dental rehabilitative services in operating rooms in hospitals and ambulatory surgical centers, as well as addressing ongoing issues related to the collection of samples from the mouth or jaw for the purpose of diagnostic testing;
- Activities to increase oral health equity, including incentivizing dentists to practice in underserved communities across the United States; and
- Continued discussions surrounding Medicare, its potential expansion to include dental benefits and how best to ensure an adequate network of providers by:
 - Establishing a comprehensive dental benefit that meets the needs of beneficiaries up to 300% of the federal poverty level (FPL); and

September 8, 2021
Page 2

- Including dental through a separate new program dedicated to providing comprehensive dental care for low income seniors – not the Medicare Part B program which would take much longer to implement, include many administrative burdens and have a years' long process to sort out a fee schedule.

We would welcome the opportunity to meet with you to discuss how we can meet these challenges together. To schedule a call, please contact Mr. David Linn at 202-789-5170 or linnd@ada.org.

Sincerely,

Daniel J. Klemmedson, D.D.S., M.D.
President

Kathleen T. O'Loughlin, D.M.D., M.P.H.
Executive Director

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