

September 10, 2024

The Honorable Morgan Griffith
Chairman
Subcommittee on Oversight and Investigations
Energy and Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Kathy Castor
Ranking Member
Subcommittee on Oversight and Investigations
Energy and Commerce Committee
2322A Rayburn House Office Building
Washington, DC 20515

Dear Chairman Griffith and Ranking Member Castor,

On behalf of our 159,000 members, the American Dental Association (ADA) is writing about the September 11, 2024, Subcommittee on Oversight and Investigations hearing titled, “A Year Removed: Oversight of Securing the U.S. Organ Procurement and Transplantation Network Act Implementation.” The ADA appreciates the opportunity to contribute to this important discussion and emphasizes the essential role that dental services play in the success of organ transplants and patient outcomes.

The ADA has supported the inclusion of dental services as part of the comprehensive medical care necessary for successful organ transplants. As we noted in our previous comments submitted to the Centers for Medicare & Medicaid Services (CMS), oral health can be intrinsically linked to overall health. Failure to address dental infections prior to organ transplant procedures can significantly compromise the success of the surgery and the patient’s long-term health. Studies have demonstrated that some oral infections can lead to systemic infections that affect surgical outcomes and patient recovery.¹

We commend Congress for passing the bipartisan Organ Procurement and Transplantation Network Act, which provides critical improvements to the system. However, challenges remain in ensuring that patients undergoing organ transplants receive the necessary comprehensive care, including dental services. Primarily, many individuals who await transplants are not able to proceed due to presence of dental infection that must be treated by dental providers to mitigate the risk of immunosuppression and transplantation rejection. The ADA has previously endorsed CMS rules to pay for dental examinations as part of a pre-transplant medical workup, as well as necessary dental treatments to eliminate oral infections prior to surgery (CMS-1770-P, 2022).²

We urge the full committee to prioritize the inclusion of dental care as an essential element in patient care. Dental care plays a pivotal role in reducing complications and improving the quality

¹ Scannapieco FA, The oral microbiome: its role in health and in oral and systemic infections. Clin Microbiol Newsl. 2013; 35: 163-169

² Federal Register, [Medicare and Medicaid Programs; CY 2023 Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment and Coverage Policies](#), November, 18, 2022.

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of life, especially for transplant patients. As we noted in previous comments to CMS,³ comprehensive dental care is critical not only to the success of the surgical procedure but also to the patient's long-term health outcomes.

We appreciate your attention to these issues and are available to provide further information as needed. Please contact Mr. Chris Tampio, tampioc@ada.org or 202-789-5178 for further discussion.

Sincerely,

Linda J. Edgar, D.D.S., M.Ed.
President

Raymond A. Cohlma, D.D.S.
Executive Director

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³ American Dental Association, [Calendar Year \(CY\) 2023 Proposed Rule: Payment Policies under the Physician Fee Schedule and Other Changes to Part B Payment Policies](#), September 2, 2022.