

June 9, 2021

The Honorable Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

Dear Administrator Brooks-LaSure:

On behalf of our 162,000 members, the American Dental Association (ADA) would like to congratulate you on your confirmation as Administrator of the Centers for Medicare & Medicaid Services (CMS). Leveraging your past leadership within the U.S. Department of Health and Human Services (HHS) and the Center for Consumer Information and Insurance Oversight, the Biden-Harris Administration 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 under your purview:

- Ensuring that a permanent position of chief dental officer within the CMS is filled, a position that has been vacant since 2017;
- Expanding the participation of dentists through increased reimbursement and reduced administrative burden, such as the easement of credentialing, audit processes and encouragement of clean claims paid within 15 days;
- Requiring the CMS Center for Program Integrity to: (1) issue guidance to state Medicaid agencies (SMAs) concerning best practices in dental audits; and (2) develop 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 benchmark floor for all Medicaid dental fees at 75th percentile of regional dental fees based on ADA survey data;
- Working to enhance consistent adult dental benefits across all Medicaid programs;
- Working 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;
- Within the Affordable Care Act's exchange plans, making pediatric oral health coverage mandatory for families with children and including maternal oral health as an essential health benefit for one-year post-partum among other areas of interest we have;
- Activities to increase oral health equity, including incentivizing dentists to practice in underserved communities across the United States and strengthening support for Action for Dental Health Initiatives.

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We would welcome the opportunity to meet with you to discuss how we can meet these challenges together. If you have any questions, please contact Mr. David Linn at 202-789-5170 or [linnd@ada.org](mailto: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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