



The Medicare Oral Health Coalition—which includes leading organizations representing oral health, health care consumers, older adults, people with disabilities, patients, providers, industry, social service, and others—applauds the inclusion of “medically necessary” Medicare dental coverage in the 2023 Medicare Physician Fee Schedule proposed rule. We are thrilled to see the Biden Administration publicly recognize the need for improving Medicare dental coverage and take this first step to making more meaningful medically necessary coverage a reality. 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.

With millions of older adults and people with disabilities unable to afford the dental care they need to stay healthy, adding oral health coverage to Medicare is critical.<sup>i</sup> Moreover, Medicare’s lack of dental coverage exacerbates underlying racial, geographic, and disability-related health and wealth disparities.<sup>ii</sup> Improved coverage for medically necessary dental care would mitigate some of these disparities by ensuring that Medicare enrollees who need dental treatment as part of their covered medical care can get the full scope of care they need to get healthy without having to make impossible financial tradeoffs.

There is also broad support from the public, stakeholders, and Congress to take this step. Over 80% of voters in America support improving Medicare dental coverage, including a majority of Republicans, Democrats, and Independents.<sup>iii</sup> A diverse group of roughly 240 stakeholder organizations have advocated on behalf of “medically necessary” dental coverage in a publicly issued community statement.<sup>iv</sup> Over a hundred and twenty Members of Congress have shown their support, including 22 Senators and 112 Representatives, who recently sent letters to the Administration urging action in late June.<sup>v</sup>

The Medicare statute clearly creates room for the Centers for Medicare and Medicaid Services (CMS) to exercise their authority in this area more fully. CMS currently exercises its authority to cover medically necessary dental care in a very limited way, providing coverage in only a few specific instances.<sup>vi</sup> By taking steps to maximize its existing authority, CMS could ensure “medically necessary” dental care includes a more complete scope of oral health services for people undergoing transplants, cardiovascular care, cancer therapies and other critical medical treatments.<sup>vii</sup>

The Biden Administration has an opportunity now to deliver on this much sought-after benefit to older adults and people with disabilities. We look forward to working with CMS on this critical policy and submitting more detailed comments on the proposed rule.

*The Medicare Oral Health Coalition is dedicated to ensuring that all Medicare enrollees have affordable, comprehensive oral health coverage as part of their overall health coverage. Current members include Families USA, AARP, National Rural Health Association, National Association of Community Health Centers, American Heart Association, American Diabetes Association, Justice in Aging, Center for Medicare Advocacy, The Arc of the United States, American Dental Hygienists’ Association, National Council on Aging, Meals on Wheels, the CareQuest Institute for Oral Health, Community Catalyst, the Gerontological Society of America, the National Association of Social Workers (NASW), and the Oral Health Progress and Equity Network (OPEN) Inc. The views expressed by the Coalition do not necessarily represent those of individual members.*



---

<sup>i</sup> Burroughs, M., E. Fishman and G. Hall. "What's At Stake for America's Families: Why Congress Must Go Big and Bold in Reconciliation to Improve Health and Health Care for Millions of People." Families USA. September 10, 2021. <https://familiesusa.org/resources/whats-at-stake-for-americas-families-why-congress-must-go-big-and-bold-in-reconciliation-to-improve-health-and-health-care-for-millions-of-people/>

<sup>ii</sup> Christ, A., G. Burke and J. Goldberg. Adding a Dental Benefit to Medicare: Addressing Racial Disparities. Justice in Aging. October 2019. <https://www.justiceinaging.org/wp-content/uploads/2019/10/Addressing-Oral-Health-Equity-by-Adding-a-Dental-Benefit-to-Medicare.pdf>

<sup>iii</sup> Sainato, M. "Millions in US hope plan to expand dental care survives cuts to Biden's bill" *The Guardian*. October 20, 2021. <https://www.theguardian.com/us-news/2021/oct/20/us-healthcare-millions-americans-medicare-dental-care#:~:text=The%20majority%20of%20Americans%20support,dental%2C%20vision%20and%20hearing%20coverage>

<sup>iv</sup> "Community Statement on Medicare Coverage for Medically Necessary Oral and Dental Health Therapies." Families USA. June 15, 2022. <https://familiesusa.org/resources/community-statement-on-medicare-coverage-for-medically-necessary-oral-and-dental-health-therapies/>

<sup>v</sup> Senator Debbie Stabenow and Senator Benjamin L. Cardin. "Letter to CMS on Medically Necessary Dental Coverage." June 21, 2022. <https://www.cardin.senate.gov/wp-content/uploads/2022/06/Letter-to-CMS-on-Medically-Necessary-Dental-Coverage.pdf> ; Representative Lloyd Doggett and Representative Nannette Barragan. "Letter to CMS on Medically Necessary Dental Coverage". June 29, 2022. <https://doggett.house.gov/sites/evo-subsites/doggett.house.gov/files/evo-media-document/Expand%20Medically%20Necessary%20Dental%20Coverage.pdf>

<sup>vi</sup> Center for Medicare and Medicaid Services. *Medicare dental coverage*. Medicare Dental Coverage. <https://www.cms.gov/Medicare/Coverage/MedicareDentalCoverage>

<sup>vii</sup> Medicare Benefit Policy Manual, Chapter 15, § 150. See also Medicare Benefit Policy Manual, Chapter 16, § 140.

*The Medicare Oral Health Coalition is dedicated to ensuring that all Medicare enrollees have affordable, comprehensive oral health coverage as part of their overall health coverage. Current members include Families USA, AARP, National Rural Health Association, National Association of Community Health Centers, American Heart Association, American Diabetes Association, Justice in Aging, Center for Medicare Advocacy, The Arc of the United States, American Dental Hygienists' Association, National Council on Aging, Meals on Wheels, the CareQuest Institute for Oral Health, Community Catalyst, the Gerontological Society of America, the National Association of Social Workers (NASW), and the Oral Health Progress and Equity Network (OPEN) Inc. The views expressed by the Coalition do not necessarily represent those of individual members.*