



*For Immediate Release  
November 8, 2024*

## **Public Statement on Medicare Coverage of Medically Necessary Oral and Dental Health Therapies**

The Consortium for Medically Necessary Oral Health Coverage is pleased to commend the Centers for Medicare and Medicaid Services (CMS) for its regulatory action to improve the lives of millions of Medicare beneficiaries. In recent years, CMS has clarified that Medicare payment is available for dental services that are inextricably linked to and substantially related and integral to the clinical success of certain Medicare-covered medical services, including but not limited to organ transplant surgery, cardiac valve replacement, valvuloplasty procedures, and cancer treatment. Importantly, CMS also established an annual process for stakeholders to nominate additional clinical scenarios for Medicare payment, marking the first time stakeholders have been able to propose for CMS' formal consideration covered medical services for which clinical evidence demonstrates that dental care is inextricably linked and substantially related and integral to their clinical success.

Building on this progress, the 2025 Physician Fee Schedule further clarifies Medicare payment policy for dental services that are inextricably linked to the treatment of beneficiaries with End Stage Renal Disease (ESRD). Consortium members utilized the annual nominations process to urge CMS to take this action due to evidence of the nexus between dental and oral health and dialysis. As a result, the Consortium is pleased that, beginning January 2025, dental and oral examinations as well as diagnostic and treatment services to eliminate an oral or dental infection will be covered by the Medicare program for beneficiaries with ESRD.

The Consortium also wishes to express its gratitude to CMS for once again welcoming stakeholder nominations and including this payment clarification in the Physician Fee Schedule final rule. Since more than half a million Medicare beneficiaries with ESRD receive dialysis services every year, the Agency's action holds the potential of having a meaningful impact in the lives of a large population of beneficiaries and their families.

Action of this nature is critically important. While overall health is inextricably linked to oral health, dental care has long been inaccessible to millions of Medicare beneficiaries, not only increasing their risk of suffering untreated periodontal disease, but also increasing Medicare beneficiaries' risk of suffering chronic conditions such as diabetes, autoimmune disease, kidney disease, heart disease, and numerous forms of cancer, with the result being an increase in overall Medicare program costs. For this reason, the Consortium welcomes the final Medicare Physician Fee Schedule for 2025 as another meaningful step forward for Medicare beneficiaries, Medicare solvency, and oral systemic health.

“By clarifying Medicare payment of medically necessary dental care for beneficiaries with ESRD who receive dialysis treatment, CMS is continuing to make progress in improving outcomes and reducing costs,” said Dr. Judith Haber on behalf of the Sante Fe Group. “We are equally pleased the Agency has expressed its commitment to exploring the inextricable link between dental and medical services and other chronic conditions, including diabetes and autoimmune disease.”

“By recognizing Medicare payment of medically necessary dental care for beneficiaries who receive dialysis services to treat End-Stage Renal Disease, CMS will help ensure that more than half a million beneficiaries who receive dialysis for ESRD today will have access to the medically necessary oral care they need,” agreed Jeffrey Silberzweig, MD, Chief Medical Officer of The Rogosin Institute, Professor of Clinical Medicine at Weill Cornell Medical College, Medical Director for Dialysis Services at New York-Presbyterian Hospital/Weill Cornell and Lower Manhattan Hospitals, and Co-Chair of the American Society of Nephrology’s COVID-19 and Other Emerging Threats Workgroup.

“We applaud this enhanced clarification of Medicare payment policy and the progress CMS continues to make towards more equitable health care for people who rely on Medicare,” said Bailey Reavis, Manager of Federal Relations for Families USA. “In this final rule, CMS has once again demonstrated its sensitivity to stakeholders’ input, and its commitment to consider additional chronic diseases is very encouraging for all who seek further payment clarification in the years ahead.”

“For decades, Medicare beneficiaries suffered due to a lack of access to medically necessary dental care,” emphasized Center for Medicare Advocacy Co-Director David Lipschutz. “Thanks to the evidence-based action the Medicare program continues to take, we are moving closer and closer to a future of better health, improved quality of life, and greater program equity.”

In support of transformative change, nearly 250 leading organizations joined as signatories of the Consortium’s Community Statement to urge Congress and the Administration to explore options for extending evidence-based coverage to all Medicare beneficiaries. The Consortium will now turn to the forthcoming February 10, 2025 deadline for nominations of additional clinical criteria, and we look forward to continued consideration of Medicare payment clarification for medically necessary oral and dental services that are inextricably linked, essential, and of profound clinical, fiscal, and human value.

The signatories of the Consortium’s Community Statement are listed below:

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| AARP   | American Association for Community Dental Programs               |
| ABLE NH (Advocates Building Lasting Equality in NH)      | American Association for Dental, Oral, and Craniofacial Research |
| ACA Consumer Advocacy                                    | American Association of Clinical Endocrinologists                |
| Access Dental Care                                       | American Association of Colleges of Nursing                      |
| Acuity Specialists                                       | American Association of Diabetes Educators                       |
| Adenoid Cystic Carcinoma Research Foundation             | American Association of Hip and Knee Surgeons                    |
| AIDS Foundation of Chicago                               | American Association of Kidney Patients                          |
| Alliance for Retired Americans                           | American Association of Oral and Maxillofacial Surgeons          |
| Allies for Independence                                  | American Association of Nurse Practitioners                      |
| ALS Association  | American Association of Public Health Dentistry                  |
| American Academy of Developmental Medicine and Dentistry | American Association on Health and Disability                    |
| American Academy of Nursing                              | American Autoimmune Related Diseases Association                 |
| American Academy of Oral Medicine                        | American College of Cardiology                                   |
| American Academy of Oral Systemic Health                 | American College of Emergency Physicians                         |
| American Academy of Periodontology                       | American College of Gastroenterology                             |

American College of Physicians  
 American College of Rheumatology  
 American Dental Assistants Association  
 American Dental Education Association  
 American Dental Hygienists' Association  
 American Diabetes Association  
 American Geriatrics Society  
 American Head and Neck Society  
 American Heart Association  
 American Institute of Dental Public Health  
 American Kidney Fund  
 American Liver Foundation  
 American Medical Association  
 American Muslim Health Professionals (AMHP)  
 American Nephrology Nurses' Association  
 American Network of Oral Health Coalitions  
 American Nurses Association  
 American Parkinson Disease Association  
 American Psychiatric Association  
 American Psychiatric Nurses Association  
 American Public Health Association  
 American Society for Radiation Oncology  
 American Society of Clinical Oncology  
 American Society of Nephrology  
 American Society of Transplant Surgeons  
 American Society of Transplantation  
 American Thoracic Society  
 Arcora Foundation  
 Arizona Oral Health Coalition  
 Arthritis Foundation  
 Association of Asian Pacific Community Health Organizations (AAPCHO)  
 Association of Community Cancer Centers  
 Association of Oncology Social Work  
 Association of State and Territorial Dental Directors  
 Autistic Self Advocacy Network  
 Be a Hero  
 Brain Injury Association of America  
 California Dental Association  
 California Medical Association  
 CareQuest Institute for Oral Health  
 Carlson Foley Enterprises  
 Catholic Health Association of the United States  
 Center for Advocacy for the Rights and Interests of the Elderly (CARIE)  
 Center for Elder Law & Justice  
 Center for Health Law and Policy Innovation  
 Center for Medicare Advocacy  
 Center for Popular Democracy  
 Champaign County Health Care Consumers  
 Children's Dental Health Project  
 Coalition for Oral Health for the Aging  
 Coalition of Texans with Disabilities  
 Colgate Palmolive Company  
 Colorado Consumer Health Initiative  
 Community Catalyst  
 Community Dental Health NPO  
 Connecticut Oral Health Initiative  
 Cornerstone Dental Specialties  
 Crohn's and Colitis Foundation of America  
 Culpeper Wellness Foundation  
 Davis Phinney Foundation for Parkinson's  
 Delaware Dental Hygienists' Association  
 Dental Lifeline Network  
 Dental Trade Alliance  
 Dentsply Sirona  
 Dialysis Patient Citizens  
 Dientes Community Dental Care  
 Disability Rights Education and Defense Fund  
 Eating Disorders Coalition  
 Elderly Housing Development & Operations Corporation  
 Epilepsy Foundation  
 EXCELth, Inc.  
 Families USA  
 504HealthNet  
 Florida Health Justice Project  
 Georgia AIDS Coalition  
 Georgians for a Healthy Future  
 Gerontological Advanced Practice Nurses Association  
 Gerontological Society of America  
 GLMA: Health Professionals Advancing LGBTQ Equality  
 GoMo Health  
 Haleon  
 Hartford Institute for Geriatric Nursing  
 Hawaii Oral Health Coalition  
 Hawaii Children's Action Network Speaks!  
 Head and Neck Cancer Alliance  
 Health Care For All (MA)  
 Health Care Is a Human Right WA  
 Health Care Voices  
 Healthy Living and Learning Center  
 Heartland Alliance  
 Henry Schein Cares Foundation  
 HIV Medicine Association  
 Hispanic Dental Association  
 International Pemphigus and Pemphigoid Foundation  
 Island Liaison, Inc.  
 John A. Hartford Foundation  
 Jon C Burr Foundation  
 Justice in Aging  
 Kentucky Oral Health Coalition  
 Klamath Basin Oral Health Coalition  
 Lakeshore Foundation  
 Leukemia and Lymphoma Society  
 Louisiana Primary Care Association  
 Lupus and Allied Diseases Association, Inc.  
 Lupus Foundation of America  
 Maryland Dental Action Coalition  
 Massachusetts ME/CFS and FM Assoc  
 Medicaid|Medicare|CHIP Services Dental Association  
 Medicare Rights Center  
 Mended Hearts

Mental Health America  
 Metro New York Health Care for All  
 Michigan Primary Care Association  
 Minnesota Dental Therapy Association  
 myNEXUS  
 National Alliance of State & Territorial AIDS Directors  
 National Alliance on Mental Illness  
 National Association of Area Agencies on Aging  
 National Association of Chronic Disease Directors  
 National Association of Community Health Centers  
 National Association of Dental Plans  
 National Association of Hispanic Nurses  
 National Association of Nutrition and Aging Services Programs  
 National Association of Social Workers  
 National Association of States United for Aging and Disabilities  
 National Coalition of Dentists for Health Equity  
 National Comprehensive Cancer Network  
 National Committee to Preserve Social Security and Medicare  
 National Consumer Voice for Quality Long-Term Care  
 National Consumers League  
 National Council for Behavioral Health  
 National Council on Aging  
 National Dental Association  
 National Forum for Heart Disease and Stroke Prevention  
 National Hispanic Medical Association  
 National Health Law Program  
 National Interprofessional Initiative on Oral Health  
 National Kidney Foundation  
 National League for Nursing  
 National Medical Association  
 National Multiple Sclerosis Society  
 National Network for Oral Health Access  
 National Osteoporosis Foundation  
 National Rural Health Association  
 National Stroke Association  
 North American Transplant Coordinators Organization  
 Northwest Harvest  
 Nurses for America  
 Nursing Interventions for Health System Elders  
 NYU Rory Meyers College of Nursing  
 Ohio Alliance for Retired Americans Educational Fund  
 Oklahoma Policy Institute  
 Oncology Nursing Society  
 Oral Cancer Foundation  
 Oral Health Kansas  
 Oral Health Nursing Education and Practice Program  
 Oral Health Ohio  
 Oral Health Progress and Equity Network (OPEN)  
 Our Mother's Voice  
 PA Coalition for Oral Health  
 Pacific Dental Services Foundation  
 PAN Foundation  
 Parkinson's Foundation  
 Patient-Centered Primary Care Collaborative  
 Pennsylvania Health Access Network  
 PEW Dental Campaign  
 Piedmont Regional Dental Clinic  
 PRC  
 Preventive Cardiovascular Nurses Association  
 Pride At Work - WA North, Mt. Kulshan Chapter  
 Procter & Gamble  
 ProHEALTH Dental  
 Project Accessible Oral Health  
 Puget Sound Advocates for Retirement Action (PSARA)  
 Renal Healthcare Association  
 Renal Physicians Association  
 Research!America  
 Santa Fe Group  
 School-Based Health Alliance  
 Scleroderma Foundation  
 Senior Charity Care Foundation  
 Senior Mobile Dental  
 Sepsis Alliance  
 Sjögren's Foundation  
 Smiles To Go, LLC  
 Social Security Works  
 Society for Transplant Social Workers  
 Special Care Dentistry Association  
 Statewide Poverty Action Network  
 Support for People with Oral and Head and Neck Cancer  
 Texas Oral Health Coalition, Inc  
 Texas Parent to Parent  
 The AIDS Institute  
 The Arc of the United States  
 The Bingham Program  
 The CornerStone Community Development Center  
 The Michael J. Fox Foundation  
 The National Forum of ESRD Networks  
 The Society for Thoracic Surgeons  
 The TMJ Association  
 Third Way  
 Tri-Area Community Health  
 Trust for America's Health  
 United Health Organization  
 United Network for Organ Sharing  
 UUFHCT  
 Virginia Community Healthcare Association  
 Virginia Health Catalyst  
 Virginia Organizing  
 Virginia Rural Health Association  
 Washington Healthcare Access Alliance  
 Wayne County Oral Health Organization  
 Wesley Living Woodland Homes  
 West Central Initiative  
 Western Center on Law and Poverty  
 Winters Elder Day Council  
 WomenHeart, The National Coalition for Women with Heart Disease