



August 23, 2022

Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Attention: CMS-1770-P
7500 Security Boulevard
Baltimore, MD 21244-1850

Submitted via [regulations.gov](https://www.regulations.gov)

Re: Medicare and Medicaid Programs: Calendar Year 2023 Payment Policies under the Physician Fee Schedule and Other Changes to Part B Payment Policies – File code CMS-1770-P

Dear Administrator Brooks-LaSure:

California Health Advocates is submitting the following comments on the proposed 2023 Medicare physician fee schedule released on July 29, 2022.

California Health Advocates (CHA) appreciates the opportunity to provide feedback on the above-referenced Notice. CHA is a not-for-profit organization dedicated to providing quality Medicare, Medicare Supplement, and long-term care insurance information, training, and education. CHA supports the local Health Insurance Counseling and Advocacy Programs (HICAP) with training, materials and technical assistance. HICAP is California's State Health Insurance Assistance Program (SHIP).

CHA would like to express strong support for the expansion of Medicare coverage for medically necessary dental services outlined in the proposed rule. Currently Medicare coverage for oral health needs for individuals with serious medical conditions is very limited. Medicare typically will not cover care to address dental problems that are caused by a medical condition or treatment, or that could jeopardize their medical condition or treatment. Often dental care is cost prohibitive without Medicare coverage, leading many beneficiaries to forgo dental care and thereby jeopardize their other medical treatments. This can have catastrophic consequences for beneficiaries in terms of their treatment, quality of life and overall health outcomes.

We applaud CMS for recognizing that medically necessary dental care can be necessary in order to properly treat other diagnosed medical conditions, such as certain cancer treatments, organ transplants, managing diabetes, as well as many other critical treatments for other medical conditions.

We are committed to health equity in health care. We know that the lack of coverage for medically necessary dental care most impacts underserved populations and communities of color, exacerbating underlying disparities. We would like to emphasize that this CMS proposal



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to expand Medicare coverage for medically necessary dental services would improve access, improve outcomes and mitigate these health disparities.

CHA thanks CMS for this opportunity to provide comments on the proposed rule involving changes to payment policy under the 2023 Medicare physician fee schedule. We write to express strong support for inclusion of medically necessary dental care in the proposed rule and urge CMS to finalize the rule with this critical component included. If your staff have any questions, you are welcome to contact our organization at 916-465-8104.

Sincerely,

Catherina Isidro

Executive Director

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