

September 6, 2022

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services
U.S. Department of Health & Human Services
Attention: CMS–1770–P
7500 Security Boulevard
P.O. Box 8016
Baltimore, MD 21244-8016

Re: CMS-1770-P: Medicare and Medicaid Programs; CY 2023 Payment Policies Under the Physician Fee Schedule and Other Changes to the Part B Payment Policies – Medically Necessary Dental Coverage of Organ Transplant Patients

Dear Administrator Brooks-LaSure:

On behalf of the American Society of Transplantation (AST), representing a majority of the nation’s medical professionals engaged in the field of solid organ transplantation, we appreciate the opportunity to provide brief comments regarding the CY 2023 Physician Fee Schedule Proposed Rule. The AST applauds and commends the Agency for its recent proposal seeking to ensure that Medicare beneficiaries have access to medically necessary and essential dental services. As CMS accurately describes within the proposed rule, the issue of oral health care, infection, and transplant candidates has been a major patient challenge for many years. Organ transplantation seeks to improve, extend and preserve life. AST appreciates the Agency’s thoughtful consideration for expanding Medicare coverage to organ transplant candidates that will become imminently immunocompromised.

As a significant factor for consideration and clearance for organ transplant, proper oral health care is imperative to protecting the health, well-being, and life of the recipient and donor organ. As you know, dental infections of any kind can be a life-threatening challenge for organ transplant patients and cause sepsis and surgical site infections. The bottom line: Medicare coverage of medically necessary dental procedures for organ transplantation removes yet another barrier to patient access and increases the nation’s ability to improve, extend and save lives.

The AST wishes to thank CMS for the opportunity to support and endorse the Agency’s

AST NATIONAL OFFICE

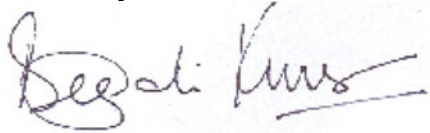
1000 Atrium Way, Ste 400 • Mt. Laurel, NJ 08054
856.439.9986 • Fax: 856.581.9604
info@myAST.org • myAST.org

GOVERNMENT RELATIONS

William Applegate, Director of Government Relations
Polsinelli
1401 Eye Street NW, Ste: 800 • Washington, DC 20004
202.258.4989 • bapplegate@polsinelli.com

proposed coverage expansion of medically necessary and essential dental services to include organ transplant patients. If you have questions or require any additional information, please do not hesitate to contact me directly. The AST Director of Government Relations, Bill Applegate, may also be reached at (202) 258-4989 or bapplegate@polsinelli.com.

Sincerely,

A handwritten signature in cursive script, appearing to read "Deepali Kumar", written in black ink on a light-colored background.

Deepali Kumar, MD, MSc, FRCPC, FAST
President