

February 14, 2020

The Honorable Alex Azar II
Secretary
U.S. Department of Health and Human Services
200 Independence Ave, SW
Washington, DC 20201

Dear Secretary Azar:

We applaud your efforts to deliver on President Trump's Advancing American Kidney Health Initiative. You have stated that the U.S. Department of Health and Human Services (HHS) will reform regulations so that fewer Americans suffer kidney failure, more options are available for dialysis patients, and more organs are available for transplant. With that in mind, the undersigned stakeholders write to request that the Center for Consumer Information & Insurance Oversight (CCIIO) provide the option of purchasing dental coverage independent of medical coverage on the federal health insurance Marketplace. This change will increase access to dental care, particularly for those patients wanting, awaiting, and recovering from organ transplants.

As you know, oral health is a critical component of overall health and wellness. Ensuring coverage of dental care has the potential to reduce costs while improving outcomes. Routine dental care is critical for transplant patients before and after surgery. For chronic kidney disease (CKD) patients wanting a preemptive transplant, oral health complications and inflammation make it critical that patients receive dental care prior to seeking an organ donor. Without proper oral hygiene, transplants are delayed. In fact, you must have good oral hygiene to be active on a transplant list. Medications used to prevent organ rejection weaken the immune system. A common periodontal infection may lead to much broader health complications when left untreated on a transplant patient. According to the National Institute of Dental and Craniofacial Research: "Whenever possible, all active dental disease should be aggressively treated before transplantation, since post-operative immunosuppression decreases a patient's ability to resist systemic infection."

Currently, Medicare only covers the final oral exam before transplant surgery at a hospital. All other dental care for chronic kidney disease patients before their transplant surgery and before they are even accepted onto an organ waitlist, must be handled outside of Medicare. Most must turn to the private individual market for a stand-alone dental plan (SADP) to pair with their healthcare or Medicare coverage. Allowing the independent purchase of SADPs on the health insurance Marketplaces would expand dental coverage for patients and improve their oral health for the duration of their wait time and after their surgery.

Given the importance of expanding access to dental care for CKD and transplant patients, we strongly urge HHS to allow independent purchase of dental coverage on the Marketplace. This solution is consistent with existing statute and will ensure that individuals, families, and patients with critical oral health needs get the dental care they need. Thank you for your

attention to this matter. We look forward to working with you to resolve the issue for all patients, including those wanting to gain a new life through transplant.

Sincerely,

American Association of Kidney Patients
American Council of Life Insurers
American Society of Nephrology
American Society of Transplantation
American Society of Transplant Surgeons
Delta Dental Plans Association
Dialysis Patient Citizens
Eye Bank Association of America
Global Liver Institute
National Association of Dental Plans
National Kidney Foundation
Nonprofit Kidney Care Alliance
Renal Physicians Association

Cc: Seema Verma, Administrator, Centers for Medicare & Medicaid Services