

December 04, 2023

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

RE: Patient Protection and Affordable Care Act, HHS Notice of Benefit and Payment Parameters for 2025; Updating Section 1332 Waiver Public Notice Procedures; Medicaid; Consumer Operated and Oriented Plan (CO-OP) Program; and Basic Health Program

Comments submitted via: <http://www.regulations.gov>

Dear Administrator Chiquita Brooks-LaSure:

On behalf of the American Association of Endodontists (AAE), we appreciate the opportunity to provide comments in response to the HHS Notice of Benefits and Payment Parameters for 2025 proposed rule. The AAE is the largest global association of endodontists, representing more than 8,000 members that are committed to delivering the highest standards of oral health care to their patients. Endodontists are dental specialists with distinctive expertise in the diagnosis and management of dental pain. Their specialty extends to preserving patient's natural teeth through root canal therapy and related surgical procedures, thereby contributing to the overall well-being and oral health of individuals under their care.

Increased Access to Dental Services

AAE commends CMS for acknowledging the vital role that oral health plays in enhancing overall health outcomes and improving patients' quality of life. Recognizing the link between dental cancer, diabetes, heart disease, and stroke - reinforces the importance of maintaining access to quality dental care for improved patient outcomes.¹

For these reasons, we support CMS' policy proposal to empower states with the option to include non-pediatric dental services as an Essential Health Benefit (EHB). Removing the regulatory prohibition on non-pediatric dental services aligns state EHB-benchmark plans more closely with the private marketplace. Given the expanding dental benefit offerings in employer-based plans, it is fitting that the scope of EHBs be extended to Americans obtaining healthcare coverage through Exchanges. We urge the finalization of this provision and encourage the Agency to conduct oversight of Qualified Health Plans (QHPs) to ensure the prioritization of patient care and fair reimbursement of dental providers.

Implementation of Exchange Network Adequacy Standards

AAE supports the proposal to establish time and distance network adequacy standards for QHPs in State-based Exchanges, mirroring the standards set for Federally-facilitated Exchanges. The establishment of stringent network adequacy standards is critical in ensuring continual access to high-quality dental care and incentivizing fair negotiations between insurers and dental providers during the network contracting process. This proposal would ensure that patients have viable options for accessing dental care, reducing barriers such as unreasonable travel and treatment delays. AAE supports the adoption of this provision and looks forward to collaborating with CMS to ensure that patients enrolled in State-based QHPs have access to a sufficient network of dental providers, including endodontists.

¹ American Dental Association. "Oral-Systemic Health." <https://www.ada.org/resources/research/science-and-research-institute/oral-health-topics/oral-systemic-health>

Thank you again for the opportunity to provide insight during the rulemaking process. We look forward to further collaborating with the Agency to advance our shared endeavor of improving patients' access to quality dental care. Please contact Catherine French, AAE's Assistant Executive Director for Advocacy and Professional Relations, at cfrench@aae.org or at (312) 872-0474 for additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Hirschberg". The signature is stylized and includes a long horizontal line extending to the right.

Craig Hirschberg, DDS
President, American Association of Endodontists