

**BOARD OF DIRECTORS**

February 9, 2024

**OFFICERS**

**President**

Jennifer Payton

**President-Elect**

Nancy Colobong Smith

**Immediate Past President**

Angela Kurosaka

**Secretary**

Kristin Larson

**Treasurer**

Molly Cahill

**Director**

Michelle Gilliland

**Director**

Faith Lynch

**Director**

Teresa Villaran

**Emerging Professional Fellow**

Thomas De Leon

**Executive Director**

Michele Kimball

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

Re: Dental Recommendations for CY 2025 Review

Dear Administrator Brooks-LaSure:

On behalf of the American Nephrology Nurses Association (ANNA), I write to provide further comments on the proposed rule for CY 2023 Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment and Coverage Policies; Medicare Shared Savings Program Requirements; Implementing Requirements for Manufacturers of Certain Single-dose Container or Single-use Package Drugs To Provide Refunds With Respect to Discarded Amounts; and COVID-19 Interim Final Rules. Our comments below focus on additional authorities, including waiver authorities, the Centers for Medicare and Medicaid Services (CMS) should take with respect to dental care under this proposed rule.

ANNA improves members' lives through education, advocacy, networking, and science. Since it was established as a nonprofit organization in 1969, ANNA has been serving members who span the nephrology nursing spectrum. ANNA has a membership of over 7,000 registered nurses and other health care professionals at all levels of practice. Members work in areas such as conservative management, peritoneal dialysis, hemodialysis, continuous renal replacement therapies, transplantation, industry, and government/regulatory agencies. ANNA is committed to advancing the nephrology nursing specialty and nurturing every ANNA member. We achieve these goals by providing the highest quality educational products, programs, and services. Our members are leaders who advocate for patients, mentor each other, and lobby legislators, all to inspire excellence.

As you know, oral health is a vital component of overall physical health and can be especially important for preventing life threatening comorbidities in individuals receiving dialysis. ANNA urges CMS to consider existing waiver authorities to allow Medicare to reimburse for diagnostic and therapeutic dental services for Medicare

beneficiaries living with end-stage renal disease (ESRD) and those currently receiving dialysis. Dental services are critical for preventative care, and an abundance of research demonstrates that routine dental exams and cleanings reduces a patient's risk of developing cardiovascular disease, diabetes, kidney, and liver disease, and even dementia. Medicare ESRD beneficiaries on dialysis are at greater risk for developing cardiovascular conditions, making dental services more critical to the success of kidney care treatments. The lack of access to affordable dental care for Medicare ESRD beneficiaries substantially increases the risk of complications from ESRD, leading to higher medical bills for individuals, and further straining the Medicare program financially.

Furthermore, it is also critically important to ensure that the lack of dental care is not a barrier to kidney transplants. Pre-transplantation dental care involves eliminating possible sources of oral infection that can lead to a systemic infection following transplant.<sup>1</sup> Therefore, without access to dental services, individuals on dialysis may not qualify for kidney transplantation or may have severe complications after the transplant.<sup>2</sup>

We appreciate the opportunity to comment on this very important matter. As always, we are eager and available to serve as a resource to CMS on this and other nephrology-related matters. Please do not hesitate to contact me Jennifer Payton at [payton\\_jennifer@yahoo.com](mailto:payton_jennifer@yahoo.com) if you have any questions, or if we can be of assistance.

Sincerely,



Jennifer Payton  
President  
American Nephrology Nurses Association

---

<sup>1</sup> Hartford Hospital, What Every Transplant Patient Needs to Know About Dental Care, *available at* <https://hartfordhospital.org/file%20library/services/transplant%20services/dentalcare.pdf>. Last visited February 6, 2024.

<sup>2</sup> Id.