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January 20, 2022

Ms Carol Blackford
Centers for Medicare and Medicaid Services
Hospital and Ambulatory Policy Group
7500 Security Boulevard
Baltimore, MD 21244

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Dear Ms. Blackford:

On behalf of the American Academy of Pediatrics (AAP), a non-profit professional organization of more than 67,000 primary care pediatricians, pediatric medical subspecialists, and pediatric surgical specialists dedicated to the health, safety and well-being of infants, children, adolescents, and young adults, I write to request that the Centers for Medicare and Medicaid Services (CMS) take action to improve children's access to needed dental care. The AAP joins the dental community in expressing concern that some children with extensive dental needs are waiting for as long as [six months or more to receive needed care in a hospital operating room and in some cases, denied care altogether](#). Without action to ameliorate this inappropriate delay, children will continue to suffer from painful dental conditions, risk the development of dental abscesses that can cause life threatening infection, and lead families with no alternative but to seek treatment in places that may be less safe such as outpatient settings with providers with varying levels of training.

According to an [advocacy report from the American Academy of Pediatric Dentistry \(AAPD\)](#), two-thirds of pediatric dentists have had their hospital operating room access curtailed, leaving many children without access to needed dental care. Based on analyses conducted by the AAPD in collaboration with the broader dental community, the delays in dental treatment appear to stem from a lack of a suitable way to report the facility resources required for hospital- or ambulatory surgery center-based dental procedures and receive adequate payment for these procedures. These delays have been exacerbated by the COVID-19 pandemic, as hospitals were initially required to halt non-essential procedures and then faced significant backlog. Medical cases have resumed while dental cases, without a suitable coding and payment option, continue to be placed on hold.

The highest rates of dental decay (caries) are in children and youth with special health care needs, as well as children whose families live below the federal poverty level or are from historically under-resourced communities. Chronic infection from untreated dental caries can cause significant mouth pain resulting in problems with eating, sleeping, school attendance, and overall well-being. The AAP supports the health of all children and asks that CMS work with the pediatric and dental communities to address this situation.

The dental community has proposed the establishment of a new Healthcare Common Procedure Coding System (HCPCS) Level II Category G facility code for covered dental surgical services that require general anesthesia and are performed in a hospital or an ambulatory surgery center. The AAP supports this effort and encourages CMS to establish an appropriate Medicare billing option and encourage state Medicaid programs to recognize these Medicare codes and cover and pay adequately for these important dental services.

The AAP stands with the dental community in requesting CMS action to ensure children have timely access to needed dental surgical procedures. Should you have any questions, please do not hesitate to contact Stephanie Glier, Director of Federal Advocacy at sglier@aap.org.

Sincerely,

A handwritten signature in cursive script that reads "Moira Spagnino". The signature is written in black ink and includes a long horizontal flourish at the end.

President

MAS/kb