



February 28, 2024

Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attention: Recommendation on Dental Codes for Assignment to Clinical APCs for CY 2025

Submitted via: [outpatientpps@cms.hhs.gov](mailto:outpatientpps@cms.hhs.gov)

Re: Recommendation on Dental Codes for Assignment to Clinical APCs for CY 2025

Dear Sir/Madam:

The American Association of Oral and Maxillofacial Surgeons (AAOMS) represents more than 9,000 oral and maxillofacial surgeons in the United States. We recognize CMS' overarching commitment to patient safety but wish to emphasize that evolving technology and treatment modalities have allowed for increasingly complex procedures to be performed safely and efficiently across a wide range of care settings, including hospital outpatient departments. We appreciate the opportunity to provide information on select dental procedures/codes for CMS' evaluation and consideration for assignment to clinical ambulatory payment classifications (APCs) for CY 2025.

OMSs routinely evaluate and safely treat patients with a wide range of complexities across various care settings. Therefore, we offer additional services to consider for coverage in the hospital inpatient and outpatient settings that may be rendered to identify, diagnose and treat oral or dental infections linked to certain acute conditions and Medicare-covered therapies. Among the services that may contribute to the elimination of an oral or dental infection are a variety of dental surgical procedures including, but not limited to, surgical interventions to facilitate tooth eruption, alveoloplasty or ridge preparation and removal of lateral exostosis of the jaws. Further, these procedures may be appropriate for payment under the OPSS, given their ability to be safely furnished in the hospital outpatient setting.

**Therefore, we submit the following CDT<sup>®1</sup> codes for CMS' consideration regarding potential assignment to clinical Ambulatory Payment Classifications (APCs) under the OPSS:**

- **Surgical procedures to facilitate tooth eruption as described by CDT<sup>®</sup> code D7283.**
- **Alveoloplasty or ridge preparation procedures as described by CDT<sup>®</sup> codes D7320 and D7321.**
- **Removal of lateral exostosis of the jaws as described by CDT<sup>®</sup> code D7471.**

In consultation with our panel of experts, these services have been identified to commonly require pre-operative evaluation and management, pre-operative imaging, administration of anesthesia, full

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<sup>1</sup> CDT<sup>®</sup> is a registered trademark of the American Dental Association.

thickness mucoperiosteal flap elevation, osteotomy, debridement of surrounding tissue and suturing of wound closure.

In the context of Medicare covered dental services, such as those linked to heart valve replacement or repair, organ transplant procedures and certain cancer treatments, these dental procedures underscore the interdependence of oral health and overall systemic health. Ensuring that dental or oral sources of infection are addressed through dental interventions, such as those noted above can be critical in minimizing the risk of endocarditis, improving the success rate of transplants and reducing the complication rates during cancer treatments.

Thank you for your consideration of these comments. Please contact Patricia Serpico, AAOMS Director of Health Policy, Quality & Reimbursement, with any questions at 800-822-6637, ext. 4394 or [pserpico@aaoms.org](mailto:pserpico@aaoms.org).

Sincerely,

A handwritten signature in black ink that reads "Mark A. Egbert, DDS, FACS". The signature is fluid and cursive, with the letters "M", "A", and "E" being particularly prominent.

Mark A. Egbert, DDS, FACS  
AAOMS President

A handwritten signature in black ink that reads "Adam S. Pitts, DDS, MD, FACS". The signature is fluid and cursive, with the letters "A", "S", and "P" being particularly prominent.

Adam S. Pitts, DDS, MD, FACS  
Chair, AAOMS Committee on Healthcare Policy, Coding & Reimbursement