



August 19, 2026

The Honorable Roger Marshall, MD
U.S. Senate
479A Russell Senate Office Building
Washington, DC 20510

The Honorable Michael Bennet
U.S. Senate
261 Russell Senate Office Building
Washington, DC 20510

Dear Senators Marshall and Bennet:

On behalf of the American Association of Oral and Maxillofacial Surgeons (AAOMS), which represents more than 9,000 oral and maxillofacial surgeons (OMSs) in the United States, thank you for your leadership in introducing the No Surprises Act Enforcement Act (S 2420). While the No Surprises Act (P.L. 116-260) established important protections for patients and created an independent dispute resolution (IDR) process to resolve payment disputes between providers and health plans, challenges with implementation and enforcement continue to affect providers.

OMSs are surgically and medically trained dental specialists who treat conditions, defects, injuries and esthetic aspects of the mouth, teeth, jaws, neck and face. After earning a dental degree from an accredited dental school, OMSs complete a minimum of four years of hospital-based oral and maxillofacial surgery residency training, which includes rotations in such areas as general surgery, anesthesia, and clinical research. OMSs practice in office-based settings, ambulatory surgery centers and hospitals, providing critical surgical care to patients across the country, including emergency and other services that may be subject to the No Surprises Act.

We applaud the No Surprises Act Enforcement Act for its efforts to strengthen accountability by increasing penalties for health plans and issuers that violate the law's balance billing requirements and establishing consequences for failing to make required payments following an IDR determination in a timely manner. In particular, requiring payment within 30 days of an IDR determination, along with penalties and interest for late or nonpayment, would help ensure that IDR determinations are meaningful and enforceable.

The legislation's transparency and reporting requirements would also provide Congress with greater insight into compliance, enforcement actions and recurring violations of the No Surprises Act. These provisions would help identify systemic problems and ensure that federal agencies have the information necessary to hold plans and issuers accountable.

AAOMS appreciates your commitment to ensuring that the No Surprises Act is implemented fairly and effectively. We look forward to working with you and your colleagues to advance S 2420. Please contact Jeanne Tuerk, Director of Government Affairs at 847-233-4321 or jtuerk@aaoms.org with any questions.

Sincerely,

A handwritten signature in black ink that reads "Robert S. Clark, DMD". The signature is written in a cursive, flowing style.

Robert S. Clark, DMD
AAOMS President