

November 21, 2025

The Honorable Mehmet C. Oz, M.D., M.B.A.
Administrator
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Dear Administrator Oz:

On behalf of the undersigned organizations representing dentists, dental specialists, and the broader oral health community, we respectfully urge the Centers for Medicare & Medicaid Services (CMS) to promptly fill the vacant Chief Dental Officer (CDO) position and to ensure that this role remains housed within the Office of the Administrator. Maintaining a senior, agency-wide oral health leader is essential to sustaining CMS's progress with integrating dental care with medical care and to supporting innovation that recognizes the connection between oral health and overall health.

Decades of research and clinical experience make clear that oral health is inseparable from general health. Many serious health conditions are closely linked to oral health status, and changes in the mouth are often among the earliest indicators of broader systemic disease. Dentists build long-lasting relationships with patients that can reveal emerging health concerns, support prevention, and improve adherence to treatment plans developed in partnership with physicians and other clinicians.

At the same time, dentistry operates under a distinct financing and delivery structure that differs in important ways from the medical system. Dental benefits are frequently carved out, administered separately, and governed by different network, utilization management, coding, and cost-sharing practices. Policies designed solely through a medical benefit lens can unintentionally undermine access to oral health care if they do not account for these differences. When oral health is not fully considered in coverage and delivery system reforms, opportunities to prevent disease and reduce downstream costs are missed. A Chief Dental Officer with deep experience in dental practice and payment policy is indispensable in helping CMS eliminate waste, fraud, and abuse while also aligning CMS regulations, demonstrations, quality initiatives and oversight activities with the realities of how dental care is delivered and financed.

Over the last year, CMS has taken important steps that underscore the need for strong oral health leadership, including integrating oral-health and medical care within the MIPS program, aligning dental and medical services in the broader health-technology ecosystem, and deploying rural health-transformation funds that many states are directing toward oral-health-related initiatives. These efforts intersect with agency priorities related to value-based care, preventive services, maternal and child health, rural and underserved communities and integration of physical health. A CDO positioned within the Office of the Administrator can coordinate across centers and offices to ensure that oral health considerations are incorporated consistently and effectively.

We are particularly concerned that, in the absence of a fully empowered Chief Dental Officer, decisions with significant implications for dentistry and oral health may proceed without adequate input from experts in dental policy and practice. This includes, for example, work on:

- Medicare Advantage oversight, including accuracy of provider directories and the transparency of supplemental dental benefits;
- Medicaid and CHIP network adequacy enforcement, as well as payment and delivery-system reforms affecting safety-net dental clinics and private dental practices, including efforts to strengthen prenatal and pediatric dental coverage;
- Innovation Center models that rely on total-cost-of-care or accountable-care structures, where dental services are often outside traditional medical benefit designs; and
- Data, quality measurement, and interoperability initiatives that must capture dental claims, encounters, and clinical information in ways usable to both dental and medical providers.

To preserve and strengthen CMS's capacity to address these issues, we respectfully request that CMS:

1. **Move expeditiously to recruit and appoint a new Chief Dental Officer** with a DDS/DMD degree and substantial clinical, policy, and leadership experience in dentistry and oral health;
2. **Maintain the CDO as a senior, agency-wide position within the Office of the Administrator**, with clear authority and responsibility to advise CMS leadership on all matters affecting oral health across centers and offices; and
3. **Provide the CDO with appropriate staff support and cross-center coordination mechanisms**, so that oral health perspectives are systematically incorporated into rulemaking, guidance, demonstrations, oversight activities, and stakeholder engagement.

We would welcome the opportunity to work with you and your team as you move to fill this vacancy. The organizations signing this letter stand ready to assist with stakeholder input, technical expertise, and ongoing dialogue to ensure that the next Chief Dental Officer is positioned for success.

Thank you for your consideration and for your continued attention to the oral health of the millions of people served by CMS programs. If you have any questions or would like to discuss this further, please contact David Linn at linnd@ada.org.

Sincerely,

American Dental Association
Academy of General Dentistry
American Academy of Neurology
American Academy of Oral and Maxillofacial Pathology
American Academy of Orofacial Pain
American Academy of Pediatric Dentistry
American Academy of Pediatrics

American Academy of Periodontology
American Association for Dental, Oral, and Craniofacial Research
American Association of Endodontists
American Association of Oral and Maxillofacial Surgeons
American Association of Orthodontists
American Dental Education Association
American Society of Dentist Anesthesiologists
American Student Dental Association
Association of Clinicians for the Underserved
Catholic Health Association of the United States
Delta Dental Plans Association
Families USA
Justice in Aging
National Association of Dental Plans
National Association of Pediatric Nurse Practitioners
National Association of Rural Health Clinics
National Network for Oral Health Access
National Rural Health Association
Society of American Indian Dentists