



September 1, 2022

The Honorable Chiquita Brooks-LaSure
Center for Medicare and Medicaid Services
Attention: CMS-1770-P
7500 Security Boulevard
Baltimore, Maryland 21244

RE: Federal Register Docket Number CMS-2022-0113 (file code CMS-1770-P), Centers for Medicare and Medicaid Services

Dear Administrator Brooks-LaSure:

Sepsis Alliance is the first and leading sepsis organization in the U.S., working in all 50 states to save lives and reduce suffering by improving sepsis awareness and care. Our organization educates healthcare providers and the public about this devastating condition, and advocates on behalf of the 1.7 million Americans diagnosed with sepsis each year – 350,000* of whom die and many more of whom live with lasting after-effects, like amputations and PTSD. We are grateful for the opportunity to provide comment on *Federal Register Docket No. CMS-2022-0113 (file code CMS-1770-P)*, regarding CMS' 2023 Payment Policies under the Physician Fee Schedule, particularly as it relates to dental procedures and infection.

Sepsis is the body's overwhelming and life-threatening response to an infection. Like strokes or heart attacks, sepsis is a medical emergency that requires rapid diagnosis and treatment and can lead to tissue damage, organ failure, and even death. An infection in the mouth that forms as a result of surgery or even just routine dental cleaning and scaling should, like all infections, be treated as quickly as possible to reduce the risk of complications, including [sepsis](#). This is especially important for individuals with compromised immune systems, who live with certain chronic conditions, and who require medical interventions such as organ transplantation. Dental care and maintenance are necessary parts of preventative healthcare for all, but especially for these higher-risk populations, among whom oral infections may be more likely to develop into sepsis.

A dental abscess or other infection of the teeth and supportive tissues should, like all infections, be treated as quickly as possible to reduce the risk of complications, including sepsis. This is especially important for individuals who are immunosuppressed because of disease (Diabetes, Leukemia, HIV, Chronic Kidney Disease), pharmaceuticals (cancer chemotherapies, biologics for management of autoimmune diseases), and/or natural aging (immunosenescence).



The American Dental Association recommends that certain people receive prophylactic or preventative antibiotics before dental work is performed. For example, individuals with certain heart conditions could be more prone to developing infective endocarditis. Similarly, individuals who are immunocompromised face a higher risk of infection more generally, and because of this, coverage for medically necessary dental care prior to certain life-saving medical procedures is appropriate and justified to minimize the likelihood of contracting an infection that leads to sepsis which, alone, costs the U.S. \$62 billion annually.

Notwithstanding being underreported, the cost of dentally prompted encounters in emergency departments is particularly expensive, totaling more than \$2 billion in 2017. During 2018, there were approximately two million such visits. 94.5% of these individuals were provided prescriptions and released. The other 5.5% required hospitalization to resolve sepsis or other complications seeded by their dental condition. Medicare beneficiaries disproportionately accounted for 31.5% of that group.¹

Sepsis Alliance appreciates the opportunity to provide public comment on this proposed rule and supports its dental health partners in ensuring greater awareness and education about oral infections that can lead to sepsis.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Heymann".

Thomas Heymann
President & CEO
Sepsis Alliance

** Formerly, Sepsis Alliance shared that approximately 270,000 people die from sepsis annually in the U.S., which did not include hospice deaths. The new number reflects a combination of deaths in-hospital (270,000) and deaths after release to hospice (80,000), which paints a more complete picture of the burden of sepsis.*

¹ Owens, P., Manski, R., Weiss, A., Emergency Department Visits Involving Dental Conditions, 2018, Healthcare Cost and Utilization Project, Agency for Healthcare Research and Quality.