May 19, 2023

The Honorable William N. Parham
Director, Paperwork Reduction Staff
Office of Strategic Operations and Regulatory Affairs
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244

Submitted via www.regulations.gov

Re: CMS-P-0015A, Agency Information Collection Activities: Proposed Collection; Comment Request.

Mr. Parham:

I am pleased to comment on behalf of Virginia Health Catalyst in response to the Center for Medicare & Medicaid Service's (CMS's) proposed agency information collection activities.

Virginia Health Catalyst (Catalyst) is a public health nonprofit organization that ensures all Virginians have equitable access to comprehensive health care, including oral health. Catalyst meets this mission through advocacy and programmatic initiatives anchored by our four pillars: policy, public awareness, community and clinical care, and public health.

Founded in 2010, Catalyst's roots are in oral health advocacy and education. Catalyst has also long worked to ensure Virginia's public drinking water is properly fluoridated so everyone can access this affordable and effective intervention. Since 2019, we have broadened our efforts to ensure equitable access to safe, affordable, and fluoridated drinking water that is trusted and preferred by all Virginians.

We strongly support CMS's proposal to add the Oral Health Impact Profile (OHIP-5) questionnaire to the Medicare Current Beneficiaries Survey (MCBS). **This proposal conveys that oral health is essential to overall health.**

The OHIP-5 is a short, validated questionnaire that assesses the impact of oral health on quality of life. It includes five questions about oral function, orofacial pain, orofacial appearance and psychosocial effects. Incorporating the OHIP-5 into the MCBS will enable CMS to collect essential data on the impact of oral health problems on Medicare beneficiaries' quality of life. This data will help CMS better understand beneficiaries' oral health needs and to craft policies that address them.

Thank you for your continued efforts to protect the health and safety of our communities. Please do not hesitate to contact me at sholland@vahealthcatalyst.org or 804-269-8721 should you have any questions.

Sincerely,
Sarah Bedard Holland

Chief Executive Officer
Virginia Health Catalyst