July 12, 2010

Ms. Cynthia Mann  
Director  
Center for Medicaid and State Operations  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard  
Baltimore, MD  21244-1850

Dear Ms. Mann:

The American Academy of Pediatric Dentistry (AAPD)¹ is writing to follow-up on the issue of dental periodicity schedules. In a January 4, 2010 letter from the AAPD and the American Dental Association to CMS EPSDT Coordinator Cynthia Ruff, the following recommendation was made:

“Ensure that all states adopt an EPSDT dental periodicity schedule and educate dental benefits administrators on its value. The ADA and AAPD have long recommended adoption of AAPD’s dental periodicity schedule. We are pleased to learn via recent testimony from CMSO Director Mann before the House Oversight and Government Reform’s Subcommittee on Domestic Policy, that all states and the District of Columbia have adopted a dental periodicity schedule and that CMS is following up to ensure that states are in compliance with federal law requiring adoption of these schedules. We would request that information on each state’s dental periodicity schedule be made available on CMS’ website or through a link from the Insure Kids Now website (www.insurekidsnow.gov) that is publicly accessible.

As there can be confusion over dental periodicity schedules, we encourage CMS to ensure that state Medicaid programs understand the essential elements of dental periodicity schedules and educate their dental benefits administrators appropriately. If these administrators are not aware of the dental periodicity

¹ Founded in 1947, the American Academy of Pediatric Dentistry (AAPD) is a not-for-profit membership association representing the specialty of pediatric dentistry. The AAPD’s 7,700 members are primary oral health care providers who offer comprehensive specialty treatment for millions of infants, children, adolescents, and individuals with special health care needs. The AAPD also represents general dentists who treat a significant number of children in their practices. As advocates for children’s oral health, the AAPD develops and promotes evidence-based policies and guidelines, fosters research, contributes to scholarly work concerning pediatric oral health, and educates health care providers, policymakers, and the public on ways to improve children’s oral health. For further information, please visit the AAPD Web site at www.aapd.org.
schedule and the importance of regularly scheduled dental appointments, we cannot expect parents or caregivers to access these important oral health services. Please refer to the attached AAPD chart.”

The AAPD is most pleased to learn about CMS plans to post dental periodicity schedules on the Insure Kids Now website. You are to be commended on your leadership in this area. We do respectfully request the opportunity to review such periodicity schedules prior to posting, to ascertain if they meet the criteria of a dental-specific schedule consistent with the AAPD’s periodicity schedule. This would help CMS determine which states might need to do additional work in this area. For your convenience, we have attached in PDF format the latest version of the AAPD dental periodicity schedule.

Thank you for considering this request. For follow-up on this matter please contact AAPD Child Advocate Dr. James J. Crall at 310-482-7680 (cell) or jcrall@dentistry.ucla.edu.

Sincerely yours,

John R. Liu, DDS
President

John S. Rutkauskas, DDS, MBA, CAE
Chief Executive Officer

cc: Cynthia Ruff, CMS EPSDT Coordinator
    Dr. A. Conan Davis, CMS Chief Dental Officer
    Dr. James J. Crall, AAPD Child Advocate