

December 15, 2017

The Honorable Eric D. Hargan
Acting Secretary
Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Dear Acting Secretary Hargan,

On behalf of the American Dental Association and the undersigned organizations, we are writing to you today to highlight a significant gap of oral health expertise within the Centers for Medicare and Medicaid Services (CMS). The agency does not currently have a Chief Dental Officer (CDO) or a dentist clinician in a position of authority to oversee oral health issues in Medicare and Medicaid. The previous CDO retired earlier this fall and we were hopeful that the agency would move swiftly to find a replacement. As we are close to the end of the year we remain concerned that CMS does not have the capacity to address clinical issues that may arise in programs under the agency's authority. We urge CMS to move forward with filling this vacancy.

Medicaid provides oral health services to millions of children, pregnant women and adults across the country. The Early Periodic Screening, Diagnosis and Treatment (EPSDT) program requires dental services to be provided to beneficiaries eligible for the program. The Children's Health Insurance Program (CHIP) also requires dental services as part of the benefit package available to children. CMS's quality strategy extends to oral health and we believe that in addition to competent staff, a licensed dentist clinician is an invaluable resource to have available as the strategy moves forward.

CMS adopted an Oral Health Strategy in April 2011¹ after a detailed review of the 16 identified states with dental utilization rates of 30 percent or less. The strategy was developed with the intent that it would evolve over time through the use of feedback from oral health stakeholders at both the state and national level. The strategy identified barriers to access to care for children and established oral health goals for Medicaid and CHIP. Since 2011, states submitted action plans with goals for their Medicaid and CHIP programs to increase 1) the rate of children ages 1-20 who receive any preventive dental service by 10 percentage points over a 5-year period and 2) the rate of children ages 6-9 who receive a dental sealant on a permanent molar tooth by 10 percentage points over a 5-year period. Since 2011, many states have increased access to preventive services and the number of enrolled children that receive sealants on permanent molars. Our organizations want to work with the states and CMS to ensure the progress continues and the other elements included in the strategy such as the expansion of the dental home model and the development of additional approaches to increase access to care, among others, are addressed. It is crucial that innovation is fostered to ensure that enrollees in Medicaid and CHIP continue to have access to oral health services.

Although we understand that a hiring freeze may be in place for the agency, we strongly urge CMS to fill the vacant CDO position and to ensure that oral health services are prioritized in a manner equal to medical services. Tooth decay is the most common, chronic disease for young children and accounts for both missed school days and pain. Regular access to preventive services, oral health education and necessary restorative treatment can go a long way in eliminating pain, preventing infection and disease and helping pave the way for children and adults to achieve optimal oral health.

¹ Improving Access to and Utilization of Oral Health Services for Children in Medicaid and CHIP Programs: CMS Oral Health Strategy. April 11, 2011. <https://www.medicare.gov/medicaid/benefits/dental/index.html>

We look forward to working with CMS going forward and offer our various expertise to help with the further evolvement of the Oral Health Strategy. Should there be any immediate questions please feel free to contact Dr. Krishna Aravamudhan at the American Dental Association, aravamudhank@ada.org or 312-440-2772 or Ms. Janice E. Kupiec, kupiecj@ada.org or 202-789-5177.

Sincerely,

American Dental Association
Academy of General Dentistry
American Academy of Oral and Maxillofacial Pathology
American Academy of Pediatric Dentistry
American Association of Endodontists
American Association of Orthodontists
American Association of Public Health Dentistry
American Association for Dental Research
American Association of Women Dentists
American College of Prosthodontists
American Dental Education Association
American Society of Dentist Anesthesiologists
National Network for Oral Health Access
National Dental Association

cc: Seema Verma, Administrator, Centers for Medicare and Medicaid Services