

September 6, 2022

Adam Barefoot, DMD, MPH  
Chief Dental Officer  
Health Resources and Services Administration  
5600 Fishers Lane  
Rockville, MD 20857

Dear Dr. Barefoot:

On behalf of our 162,000 members, we would like to thank you for meeting with the American Dental Association on August 5. Please see below for more information on the issues that were discussed by the ADA during the meeting.

### **Title VII Grants**

We would like to reiterate the importance of dental hygienists when making grants for workforce development, especially grants under Title VII, section 748, for residency and loan repayment programs. Additionally, it is critical that HRSA designate dental assistants as HRSA approved primary care dental trainees.

According to a recent ADA Health Policy Institute Economic Outlook and Emerging Issues in Dentistry survey:

- 93% of dentist owners reported that, compared to before the pandemic, it is extremely or very challenging to recruit dental hygienists;
- 84% of dentist owners find it extremely or very challenging to fill dental assistant positions;
- 34% of dentist owners said that vacancies in their office limited their ability to see more patients.<sup>1</sup>

Given these difficulties, it is imperative that Title VII grants be well funded and include the training of dental hygienists. To that end, ADA recently wrote to Congress urging increased support for the Oral Health Workforce Development Program, as well as highlighting the Grants to States to Support Oral Health Workforce Activities program.<sup>2</sup> Training more dental hygienists will improve access to care by allowing dentists to see more patients. Additionally, HRSA can further improve access to care by supporting the training of dental assistants with Title VII grants. Although dental assistants are not currently eligible for Title VII grants, they can be made eligible if HRSA designates dental assistants as approved primary care dental trainees.

Because there are many successful programs already set up to train dental hygienists and dental assistants, addressing workforce shortages through funding these programs is more cost effective than setting up new training programs for new types of mid-level providers. Despite this, the Advisory Committee on Training in Primary Care Medicine and Dentistry (ACTPCMD) recently recommended that Congress include dental therapy programs and trainees among those authorized to receive Title VII dental training grants and that the funding level for these grant programs be increased by \$6 million to train dental therapists. ADA strongly supports increasing funding for residency and loan repayment programs, but HRSA should prioritize programs for existing professions like dentists, dental hygienists, and dental assistants, rather than divert very limited training funds for expensive new programs that have not been effective at improving oral health or increasing access to care.

As HRSA works towards supporting a more adequate oral health workforce, it must have a strong and diverse dentist presence on the ACTPCMD. ADA is interested in nominating dentists to the ACTPCMD, and would also like to call your attention to the American Academy of Pediatric Dentistry's nominations of Dr. Tegwyn Brickhouse and Dr. Anupama Rao Tate. We believe they deserve full and prompt consideration. We also understand that another pediatric dentist has recently been named to the committee, and respectfully request that they be added to the committee roster on the HRSA website.

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<sup>1</sup> [https://www.ada.org/-/media/project/ada-organization/ada/ada-org/files/resources/research/hpi/july2022\\_hpi\\_economic\\_outlook\\_dentistry\\_slides.pdf?rev=4d7c6a992d3542f6bd62f4f75c184872&hash=AB9D2572A8096A556B86D2748896E6AD](https://www.ada.org/-/media/project/ada-organization/ada/ada-org/files/resources/research/hpi/july2022_hpi_economic_outlook_dentistry_slides.pdf?rev=4d7c6a992d3542f6bd62f4f75c184872&hash=AB9D2572A8096A556B86D2748896E6AD). Retrieved August 12, 2022.

<sup>2</sup> <https://www.ada.org/publications/ada-news/2022/february/ada-asks-house-to-increase-funding-level-for-oral-health-workforce-development-program>. Accessed August 12, 2022.

### **Health Professional Shortage Areas**

While HRSA's workforce projections show that there is no current shortage of general dentists<sup>3</sup>, revising measures of geographic access to care may lead to more effective allocation of oral health resources and a more adequate distribution of dentists and the dental workforce. The current design of HPSAs has a deleterious, direct impact on access to dental care services for low-income populations. A refined HPSA program could create clarity for health centers, which may feel limited based upon their designated HPSA score, and providers, who may worry about changes in scores that would force their relocation as part of loan repayment programs.

### **Action for Dental Health**

ADA has championed the Action for Dental Health (ADH) program, which is intended to provide federal funding for the dental health needs of underserved populations. ADH funding is directed towards dental disease prevention through improved oral health education, reduction of geographic and language barriers, and improved access to care, among other initiatives. Increased agency support of ADH initiatives, which fall under section 340g grants, and increased prioritization of ADH would help advance the ADA's and HRSA's efforts towards healthy equity.

### **Investment in Primary Care**

Finally, the members of the ADA and our patients would like to thank HRSA for its recent investment of nearly \$150 million in primary care programs, including \$90 million for community health centers to use for improving health equity and \$60 million for workforce and improved health care quality initiatives in rural communities. In particular, ADA appreciates the investment of these funds in the dental hygienists and dental hygiene training programs that are crucial to improving oral health across our nation.

Thank you again for taking the time to meet with the ADA. We look forward to working with you on these issues, and others, in the future.

If you have any questions, please contact Mr. Corey McGee at 202- 789-5175 or mcgeec@ada.org.

Sincerely,

Cesar R. Sabates, D.D.S.  
President

Raymond A. Cohlmia, D.D.S.  
Executive Director

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<sup>3</sup>[https://tableau.hrsa.gov/t/BHW/views/WorkforceProjections/SupplyDemandTrend?embed\\_code\\_version=3&iframeSizedToWin dow=true&:embed=y&:linktarget=\\_self&:tabs=n&:display\\_count=n&:showVizHome=n&:origin=viz\\_share\\_link](https://tableau.hrsa.gov/t/BHW/views/WorkforceProjections/SupplyDemandTrend?embed_code_version=3&iframeSizedToWin dow=true&:embed=y&:linktarget=_self&:tabs=n&:display_count=n&:showVizHome=n&:origin=viz_share_link). Retrieved August 18, 2022.