

June 3, 2015

The Honorable John McCain
Chairman
Senate Armed Services Committee
228 Russell Senate Building
Washington, DC 20510

The Honorable Jack Reed
Ranking Member
Senate Armed Services Committee
228 Russell Senate Building
Washington, DC 20510

The Honorable Lindsey Graham
Chairman
Senate Armed Services Committee
Subcommittee on Personnel
228 Russell Senate Building
Washington, DC 20510

The Honorable Kirsten Gillibrand
Ranking Member
Senate Armed Services Committee
Subcommittee on Personnel
228 Russell Senate Building
Washington, DC 20510

Dear Chairmen and Ranking Members:

On behalf of the more than 158,000 members of the American Dental Association (ADA) we object to Section 502 of the fiscal year 2016 National Defense Authorization Act that would reduce the rank for the Chief Dental Officers of the United States Army Dental Corps and the United States Air Force Dental Corps from the current statutory grade of Major General to "a grade above the grade of colonel..."

The statutory requirement for the chief dentist in the rank of Major General for the Army was established by Public Law 95-485 in 1978. For the Air Force, the requirement was established by Public Law 109-364 in 2006. This later change in Title 10 was a recognition by the Congress that there should be not only parity of grade for the chief dental officers of the Army and Air Force, but also of the importance of oral health in assuring medical readiness and timely deployment of the members of the armed services. In recognition of the importance of oral health and readiness, the Department of the Navy in 2009 supported a change to the Title 10 of Section 5138 that would have achieved rank parity for the Navy Dental Corps Chief to be a Rear Admiral (Upper Half or O-8). At any given time, there is only one General or Flag Officer in the Dental Corps for the Army, the Air Force or the Navy. Therefore, a reduction would not eliminate a General/Flag Officer billet, and any savings would be limited to the difference in compensation for a one-star and a two-star officer.

As you know, dental readiness in the military is a critically important issue for overall medical readiness. The ADA firmly believes that dentistry must maintain its position within the respective surgeon generals' offices to ensure that dental readiness is not only maintained, but improved. Reduction in rank of the chief dental officer will result in a diminution of oral health readiness at a time when the services have just begun to achieve the overall dental health levels necessary to support national defense.

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The ADA is also concerned that this change will have a negative impact on military dental officers. These dentists will view this as a step backward in the recognition of the importance of oral health and, by extension, the importance of their contributions to national defense. The ADA is very concerned that this change will also have a negative effect on the recruiting and retention of dental officers.

The ADA would also like to point out one other consequence of any proposed change in Title 10. In Title 42, Section 207, the Chief Dentist of United States Public Health Services "...shall have the grade as is prescribed by law for the officer of the Dental Corps selected and appointed as Assistant Surgeon General of the Army..." The ADA also opposes any change that would reduce the relative importance and stature of dentistry within the Public Health Service.

As the oldest and largest dental professional organization in the world, the ADA is committed to the oral health of all Americans, and is particularly concerned with the oral health of the citizens who serve in our armed services. We strongly urge you to oppose any proposal to the National Defense Authorization Act of 2016 that would reduce the current ranks of the Army and Air Force Chief Dental Officers.

Please feel free to have your staff contact Mindi Walker at walkerm@ada.org or 202-898-2404.

Sincerely,

Maxine Feinberg, D.D.S.
President

Kathleen T. O'Loughlin, D.M.D., M.P.H.
Executive Director and Chief Operating Officer

MF:KTO:mw:aw