

December 4, 2020

The Honorable Robert Wilkie
Secretary
U.S. Department of Veterans Affairs
1722 I Street, N.W.
Washington, DC 20421

Dear Secretary Wilkie:

On behalf of the American Dental Association's (ADA) more than 163,000 dentist members, we are pleased to comment on the Department of Veterans Affairs' (VA) interim final rule, Authority of VA Professionals to Practice Health Care. We offer these comments in response to your Federal Register notice of November 12, 2020 (38 FR 71838).

The ADA supports the VA's current practice of allowing VA health care professionals to deliver health care services in a state other than the professional's state of licensure, registration, certification, or other state requirement. Allowing dentists to practice their specialty within the scope and requirements of their VA employment, notwithstanding any state license or other requirements that unduly interfere with their practice, enhances veterans' access to critical dental services. The interim final rule confirms this current practice and is consistent with the ADA's comprehensive policy on dental licensure which states that provisions for freedom of movement across state lines for all dental professionals should exist to facilitate the provision of quality oral health care to the public.

The VA must maintain the ability to determine the location and practice of its health care professionals, including its 1,050 dentists, to carry out the agency's mission without any burdensome state restrictions. This interim final rule allows the VA the flexibility to mobilize and hire qualified health care professionals from any state and quickly place them in areas of need.

Responding to and reaching beyond the coronavirus pandemic, the VA's "Fourth Mission" is to improve the nation's preparedness for response to war, terrorism, national emergencies, and natural disasters by developing plans and taking actions to ensure continued service to veterans, as well as support national, state, and local emergency management, public health, safety, and homeland security efforts. The ADA fully endorses this "Fourth Mission" and supports dentists moving across state borders to meet VA mission requirements and provide essential oral health services to veterans.

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Thank you again for the opportunity to comment on Authority of VA Professionals to Practice Health Care interim final rule. We look forward to continuing to work with the VA, and would welcome the opportunity to speak with you in more detail and answer any questions you may have regarding these comments. Please contact Dr. Robert Mitton, ADA manager of legislative and regulatory policy, at 202-789-5175 or mittonr@ada.org to facilitate further discussions.

Sincerely,

Daniel J. Klemmedson, D.D.S, M.D.
President

Kathleen T. O'Loughlin, D.M.D., M.P.H.
Executive Director

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