

November 2, 2022

The Honorable Jon Tester
Chairman
U.S. Senate Committee on Veterans' Affairs
412 Russell Senate Office Building
Washington, DC 20510

The Honorable Jerry Moran
Ranking Member
U.S. Senate Committee on Veterans' Affairs
412 Russell Senate Office Building
Washington, DC 20510

The Honorable Mark Takano
Chairman
U.S. House Committee on Veterans' Affairs
364 Cannon House Office Building
Washington, DC 20515

The Honorable Mike Bost
Ranking Member
U.S. House Committee on Veterans' Affairs
364 Cannon House Office Building
Washington, DC 20515

Dear Chairmen and Ranking Members:

On behalf of the more than 162,000 members of the American Dental Association (ADA), we write to ask that you restore the head of the office of Veterans Affairs (VA) Dentistry to directly reporting to the Under Secretary for Health as stated in Title 38 U.S.C. 7306¹, or the equivalent of the military two star rank or higher. VA Dentistry offers care to over 1.3 million eligible veterans at more than two hundred clinic locations across the country. The comprehensive, often complex nature of the dental care offered through the large number of clinics across the country requires a head of VA Dentistry with the authority and scope to ensure that the dental care offered by the VA remains a well-coordinated priority.

Among other federal dental chiefs, statute has traditionally established a two-star rank. The statutory rank of Major General for the chief dentist of the Army was long-standing, having been established by Public Law 95-485 in 1978. Later, in 2006, Congress required that the chief dentist of the Air Force have the rank of Major General in Public Law 109-363. The Department of the Navy has also previously recognized the importance of oral health for military readiness by supporting changes to Title 10, Section 5138 that would have achieved rank parity for the Navy Dental Corps Chief (at the rank of Rear Admiral, Upper Half or O-8). However, following proposals to limit chief dental officers to one star ranks, the 2017 NDAA eliminated the statutory rank requirements for chief dental officer. The ADA has also advocated for restoring historic ranks for the chief dental officers of the Army and Air Force and achieving parity for the Navy.

Title 38 U.S.C 7306 states that one of the Under Secretaries for Health "shall be a qualified doctor of dental surgery or dental medicine who shall be directly responsible to the Under Secretary for Health for the operation of the Dental Service." However, the current head of VA Dentistry is an Assistant Under Secretary (AUSH), reporting to a Deputy AUSH in Clinical

¹ <https://uscode.house.gov/view.xhtml?path=/prelim@title38/part5/chapter73&edition=prelim>. Retrieved October 3, 2022.

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Operations. This, in effect, is a reverse reporting structure where the AUSH for dentistry reports to a Deputy AUSH in another service. The Deputy AUSH for Clinical Services reports to the AUSH for Clinical Services. The AUSH for Clinical Services reports to the Deputy Under Secretary for Health working under the Under Secretary for Health. These thick layers of bureaucracy and management on top of the head of VA Dentistry create the appearance of a diminution of dental care within the VA.

Beyond just the appearance of the diminished status of dentistry within the VA, VA Dentistry does not have budget authority for the President's line item for dental services and the dental funding appropriated in the budget is added to the VA Health care funding stream and released to facilities through the Veterans Equitable Resource Allocation (VERA) process. Congress should set aside dedicated funding for VA Dentistry, but the head of VA Dentistry should also be in a position to protect that funding. Because there is only one senior executive within VA Dentistry, there is no additional cost of elevating the head of VA Dentistry to a more appropriate level.

The ADA is also concerned that not elevating the head of VA Dentistry to at least an equivalent level of reporting as other Assistant Under Secretaries, or the equivalent of a two star rank or higher, will have a negative impact on the recruitment and retention of VA dentists. VA dentists may view a lower organizational position for the head of VA Dentistry as a sign that the VA is not emphasizing oral health, and that it does not recognize the contribution of VA dentists to the overall health of eligible veterans.

Finally, it is increasingly important that the head of VA Dentistry have an adequately authoritative position within the senior executive service because the number of veterans eligible for VA dentistry is increasing, and with these increases have come even greater increases in the number of veterans accessing VA Dental care. Over the last ten years the VA Dental Service has seen a one-hundred and three percent increase in eligible veterans with only a ten percent increase in VA Dental resources. The lack of commitment of new resources to VA Dentistry even while more and more veterans are becoming eligible for dental care is another indication of the need for an upgrade in the organizational position of the head of VA Dentistry, consistent with statute.

The ADA is committed to working towards better oral health for veterans, and for all Americans. We ask that you raise the head of VA Dentistry to an appropriate reporting position as the equivalent of the military rank of two star or higher.

If you have any questions, please contact Megan Mortimer at mortimerm@ada.org or at 202-898-2402.

Sincerely,

George R. Shepley, D.D.S.
President

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

GRS:RAC:mm