September 20, 2019

Brian McCarthy
Office of Regulatory and Administrative Affairs (10B4)
Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

Submitted electronically via www.regulations.gov.

Attention: OMB Control No. 2900-0823.

Dear Mr. McCarthy:

On behalf of the 163,000 members of the American Dental Association (ADA) and the many patients they serve, including our nation’s veterans, we are writing to you in regards to the information collection on the Department of Veterans Affairs (VA): Expanded Access to Non-VA Care through the MISSION Program: Veterans Community Care Program.

The ADA appreciates the VA’s work to coordinate the dental care of veterans receiving care under the Veterans Community Care Program (VCCP). However, the ADA is very concerned about the increased administrative burdens that will be placed on dental practices.

Optimal oral health for any population is best achieved through a patient-centric partnership. That type of partnership is best achieved when the dentist and members of the dental team focus their efforts on delivering patient care. It is not supported when the dental staff is required to spend valuable time on inefficient administrative processes that require substantial resources for compiling, completing, filing and transmitting excessive documentation that does not benefit the patient.

The VCCP was created in part to reduce the bureaucratic hurdles veterans face when seeking care, but Forms 10-10143b and 10-10143c will not assist the VA and dentists participating in the VCCP in meeting this goal. Instead, it may have the opposite effect of discouraging dentists from being a VCCP provider.

For Form 10-10143b, the dentist has to, in addition to filing a claim, submit a copy of all dental records including, but not limited to, images, test results, and notes or other records of what care was provided and why to the VA. This far exceeds the information needed by other public and private dental payers to process a claim which could result in requests by the VA for this additional non-normative request for information, and repeated resubmissions by the dental office as they seek to comply with the requirement. The ADA supports the use of existing electronic claims to minimize a dental office’s administrative burden.
Additionally, different dental offices use different practice management systems, and some offices are still paper-based. Duplicating and transmitting patient records will take much longer than the 5 minutes per patient claim estimated by the VA. To comply with the proposed requirements, the ADA believes that up to two hours of administrative staff time will be needed. This will be an especially large burden on dental practices that see large numbers of veterans in the VCCP.

Form 10-10143C provides a mechanism for the VA to credential dentists. Rather than have dental offices duplicate information to every payer, the ADA encourages the use of the Council for Affordable Quality Healthcare (CAQH) ProView® system by all U.S. licensed dentists, at no cost, regardless of their membership status with the ADA. CAQH ProView® is a web-based solution in use for more than 15 years that is utilized and trusted by more 1.4 million U.S. healthcare providers, including over 53,000 dentists. We ask that such a standard credentialing process be used by the VA to reduce the credentialing paperwork required of any healthcare practitioner. Such a process will expedite data collection, maintain the integrity of credential verification and reduce the number of times a practitioner must submit the same credentialing information to multiple payers.

The ADA urges the VA to adopt processes similar to other dental payers for claims processing or pre-authorizations, and to not require dental offices to submit all dental records. We also urge the VA to use ADA’s credentialing service in lieu of Form 10-10143C. Minimizing the burden of documentation will result in a more efficient process which will benefit our veterans, the VA and the dental profession.

Thank you for your consideration of this important matter. The ADA looks forward to continuing to work with the VA. Should you have any questions, please do not hesitate to contact Ms. Roxanne Yaghoubi in the ADA’s Washington office at (202) 789-5179 or yaghoubir@ada.org.

Sincerely,

/s/ Chad P. Gehani, D.D.S.
President

/s/ Kathleen T. O’Loughlin, D.M.D., M.P.H.
Executive Director

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