

March 30, 2023

American Dental Association
Council on Dental Benefits Programs
211 E Chicago Ave.
Chicago, IL 60611
Sent via email to dentalcode@ada.org

Re: The November 9, 2022, Request for Public Comment on the Enhanced CDT Code Project

Dear Council on Dental Benefits Programs:

The Academy of General Dentistry (AGD) appreciates the invitation to review and provide input on the American Dental Association's (ADA) efforts to Enhance the CDT Code, as well as the Proposed Framework of Dental Procedure Code Modifiers to Complement the CDT Code's current "Dxxxx" format.

The AGD, the only organization exclusively representing the needs and interests unique to the general dentist, is committed to advocating on behalf of those dentists and the patients they serve. As such, we believe our input provides uncommon and valuable perspective as the ADA endeavors to design a CDT Code that is robust, functions appropriately within the digital environment, and reflects treatments performed by all dentists.

General dentists provide the full spectrum of oral health care to their patients and therefore utilize CDT Codes comprehensively. This contrasts with dental specialists who use is confined to the narrow range of codes relevant to their field of concentration. This is why we believe our organization is uniquely positioned to provide broad, meaningful insight and commentary to those tasked with modernizing and retooling the existing CDT Codes.

A Note of Thanks:

We preface our remarks with a note of gratitude to Dr. Rod Hill and Mr. Frank Pokorny for meeting with members of AGD's Dental Practice Council and representatives of AGD's presidential line. That conversation provided a clear framework which proved instrumental in shaping our response to the ADA's request for feedback on the proposed structure of dental procedure code modifiers and the entirety of the enhanced CDT Code project.

AGD Position on Efforts to Enhance the CDT Code:

AGD has responded to previous requests for input by participating in several listening sessions and providing written testimony to express critical concerns. At this time, we maintain no official position on efforts to enhance the CDT Code since there are still too many unknown factors. Our most critical concerns and questions are outlined below.

AGD Observations Regarding the CDT Code and Its Current Format:

- AGD maintains that it is in the interest of both the profession and the patients we serve, that the CDT Code remains the intellectual property of the ADA.

- Co-opting of the CDT, by any external group(s), including governmental agencies and/or for-profit entities, has the potential to negatively affect the delivery of oral healthcare as well as stifle industry innovation.
- The current CDT Code is effective and operational for dentists in all practice settings and facilitates diagnosis and treatment reporting for each patient.

AGD Questions Relating to Efforts to Enhance the CDT Code:

The AGD questions whether an enhanced CDT Code will or may redound to:

- Use real time electronic technologies to confirm benefits eligibility
- Expedite claim payment by reducing the need for paper documentation or submission of supporting e-documents or files
- Reduce the frequency of requests for more information
- Establish industry-wide standards creating a more efficient and less onerous claims adjudication process
- Result in a standardization of Explanations of Benefits (EOB) forms
- Impact the structure and operations of the ADA’s Code Maintenance Committee (CMC)
- Require dental practices to allocate additional financial resources for:
 - Updated practice management software programs
 - Dedicated staff to integrate systems with clearinghouses
 - Staff education on these new systems and processes
 - Hiring new staff to implement new software and insurance systems
- Impact the management and accessibility of existing patient records
- Improve data sharing and interconnectivity between dentists/insurers/clearinghouses
- Result in the standardization and easy integration with practice management software systems
- Align dental treatment coding with medical coding

Assuming Enhancement of the CDT Code Moves Forward – AGD Suggestions:

It is understood that any effort to conduct a cost analysis to evaluate the potential impact of implementing an enhanced CDT Code is tethered to the decision of whether the project should move forward. With that said, those research results are essential to assessing the financial impact of practice integration with an enhanced CDT Code. The resulting implementation is a complex undertaking and impacts every touchpoint of the benefit claim process. (Dentists, their teams, clearinghouses, third party payers, and patients)

AGD suggests the following:

- To streamline the process, we believe official participants in next steps (practicing dentists, representatives of third-party payers, practice management companies, personnel representing governmental agencies, other industry partners, etc.) be limited to the broader dental community without undue participation by those not engaged in clinical practice
- The timeline for moving the project forward should be realistic, defined, publicly available and not place undue hardship on dentists and their teams.
 - It should also outline target goals and endpoints where key stakeholders, such as the AGD, have the opportunity to provide feedback.
- The projects’ data collection pertaining to practice patterns and outcomes, and other sensitive details, must be safeguarded to avoid potential exploitation of such data.

- The ADA’s mission is “*to help dentists succeed...*” The statement implies non-ADA member dentists are included in that mission. Accordingly, any information or training, as well as educational aids and/or guides developed to assist with office integration and use, must be communicated and available to all dentists regardless of membership status.

Conclusion:

On behalf of AGD’s approximately 40,000 general dentist members, we appreciate the opportunity to provide feedback on this important and prodigious project. We urge continued collaboration and information sharing transparency with the major stakeholders in this endeavor. We look forward to receiving status updates once the Council on Dental Benefits Programs (CDBP) and the ADA Board process and consider the requested feedback.

Sincerely,



Hans P. Guter, DDS, FAGD
President

HPG/ckn

- cc:
- Dr. Rod Hill, Chair, CDBP Coding and Transactions Committee
 - Dr. Krishna Aravamudhan, Senior Vice President, ADA Practice Institute
 - Mr. Frank Pokorny, Senior Manager, ADA Center for Dental Benefits, Coding and Quality
 - Dr. Merlin P. Ohmer, AGD President-Elect
 - Dr. Chethan Chetty, AGD Vice President
 - Dr. Darren Greenwell, Chair, AGD Dental Practice Council
 - Dr. Arlene O’Brien, Member, AGD Dental Practice Council and AGD’s Alternate to the CMC
 - Dr. Ralph Cooley, Member, ADA Task Force to Enhance the CDT Code, AGD’s Delegate to the CMC, and Member, AGD Legislative and Governmental Affairs Council
 - Ms. Colleen Lawler, AGD Executive Director
 - Mr. Daniel Buksa, AGD Associate Executive Director, Public Affairs
 - Ms. Jeanie Kennedy, AGD Manager, Dental Practice & Policy
 - Ms. Cindy Kluck-Nygren, AGD Manager, AGD Dental Practice Council