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October 16, 2023

Adam Barefoot, DMD, MPH
Chief Dental Officer
Health Resources and Services Administration (HRSA)
5600 Fishers Lane
Rockville, MD 20857

Dear Chief Dental Officer Barefoot:

On behalf of our 40,000 members, the Academy of General Dentistry (AGD) urges evaluation and revision of the existing dental Health Professional Shortage Areas (HPSA)¹ designation programs.

The US dental workforce has experienced changes during the last several years.² The existing supply of dentists today is sufficient to meet the demands of the U.S. market, with increases projected through 2040.³ However, the shortage of dental hygienists is impacting dental practices and the patients they serve in communities nationwide.⁴ In its document “*Oral Health Workforce Projections 2017-2030*,” HRSA cites old data and projections tied to HPI forecasts from 2017.⁵ This information is no longer valid and doesn’t reflect the complexion of the current dental workforce.

HPSA Designations

HRSA designates a dentist shortage where the ratio of the population to providers is less than 3500 to one (or 3000 to one if there are unusually high needs in the community). Kaiser Family Foundation maintains that designations are not withdrawn until a Federal Register notice is published, generally once a year on or around July 1.⁶ The published number of HPSA designations may erroneously include HPSAs proposed for withdrawal and HPSAs lacking accurate data. The AGD, whose members continue to serve as a resource for federal officials’ input, is unaware of any HPSA designations being withdrawn.

HPSA designations, based on obsolete and/or incomplete data, have the potential to impact the dental workforce in the following ways:

¹ HRSA Health Service Corps. <https://bhw.hrsa.gov/sites/default/files/bureau-health-workforce/workforce-shortage-areas/nhsc-hpsas-practice-sites.pdf>

² *Supply of Dentists in the U.S. 2001-2022*. U.S. Dentist Demographic Dashboard. American Dental Association. <https://www.ada.org/resources/research/health-policy-institute/us-dentist-demographics>

³ https://www.ada.org/-/media/project/ada-organization/ada/ada-org/files/resources/research/hpi/hpibrief_0521_1.pdf

⁴ *Dental Workforce Shortages: Data to Navigate Today’s Labor Market*. American Dental Association. October 2022 <https://www.ada.org/en/resources/research/health-policy-institute/dental-practice-research/dental-workforce-shortages>

⁵ *Oral Health Workforce Projections 2017-2030: Dentists and Dental Hygienists* <https://bhw.hrsa.gov/sites/default/files/bureau-health-workforce/data-research/oral-health-2017-2030.pdf>

⁶ *Primary Care Health Professional Shortage Areas (HPSAs). Timeframe: as of September 30, 2022*. Kaiser Family Foundation <https://www.kff.org/other/state-indicator/primary-care-health-professional-shortage-areas-hpsas/?currentTimeframe=0&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D>

- Misguided funding allocations;
- Practitioner specialization choices that may exacerbate shortages of either generalist or specialist numbers;
- Policy decisions affecting loan repayment, Medicaid reimbursement rates, immigration policies aimed at a potentially nonexistent dentist shortage, and
- Incentive to open more dental schools – creating a market surplus whereby graduating dentists cannot find work.

Transparency and Federal Oversight

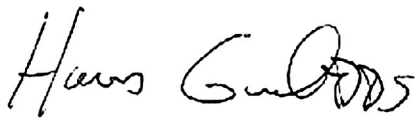
The process by which data is updated to establish dental provider and patient demographics and the frequency of that process are not evident. The U.S. Government Accountability Office (GAO) in a 2006 report states, HRSA “was unable to complete the review of designated HPSAs for continued eligibility in less than 3 years because of resource limitations.”⁷ We respectfully request information and clarity on the methodology used in assigning HPSA designations, details of the ongoing evaluation processes, and how and when these designations are withdrawn.

In Exhibit A, AGD includes several GAO reports on healthcare shortage areas and programs. All Federal programs require some form of annual reporting to both Congress and the public on performance goals, measures, budget, and project impact. Your assistance in locating this information would be greatly appreciated, as AGD’s search efforts remain unproductive.

In Closing

The AGD would like to thank HRSA for its consideration of our remarks on dental HPSAs, and we look forward to your response. If you have questions or would like to discuss this issue in greater detail, please contact Daniel J. Buksa, JD, CAE, Associate Executive Director, Public Affairs, by phone at (312) 440-4328 or via email at daniel.buksa@agd.org.

Sincerely,



Hans P. Guter, DDS, FAGD
AGD President

⁷ U.S. GAO *Health Professional Shortage Areas: Problems Remain with Primary Care Shortage Area Designation System*. October 2006, GAO-07-84.



Myron (Mike) Bromberg, DDS
AGD Chair, Legislative & Governmental Affairs Council
AGD Congressional Liaison



Darren S. Greenwell, DMD, MAGD
AGD Chair, Dental Practice Council

HPG: jk

Cc: Colleen Lawler, CAE, IOM
Executive Director
Academy of General Dentistry

Exhibit A

National Health Service Corps: Program Directs Funding to Areas with Greatest Provider Shortages

GAO-21-323

Publicly Released on: Jun 1, 2021.

Published: Apr 30, 2021.

<https://www.gao.gov/products/gao-21-323>

Health Professional Shortage Areas: Problems Remain with Primary Care Shortage Area Designation System

GAO-07-84

Published: Oct 24, 2006. Publicly Released: Oct 24, 2006.

<https://www.gao.gov/products/gao-07-84>

Health Care Access: Programs for Underserved Populations Could Be Improved

T-HEHS-00-81

GAO-21-323

Published: Mar 23, 2000. Publicly Released: Mar 23, 2000.

<https://www.gao.gov/products/t-hehs-00-81>

GAO reviewed (1) the number and location of HPSAs and federal programs that use HPSA designations to allocate resources or provide benefits, (2) available research on HPSA designation criteria and methodology, and (3) the impact of a 2002 provision that automatically designates federally qualified health centers and certain rural health clinics as facility HPSAs. GAO obtained and analyzed HHS's data on primary care HPSA designations as of September 2005 and January 2006 and identified reports on HPSA criteria and methodology through a literature search of peer-reviewed journals and other reports published since 1995.

Oral Health: Efforts Under Way to Improve Children's Access to Dental Services, but Sustained Attention Needed to Address Ongoing Concerns

Report

GAO-11-96

Publicly Released on: Nov 30, 2010. Published: Nov 30, 2010.

<https://www.gao.gov/products/gao-11-96>