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CAPT Renee Joskow Chief Dental Officer Health Resources and Services Administration Parklawn Building 5600 Fishers Lane Rockville, MD 20857

Dear CAPT Joskow:

The Academy of General Dentistry has several questions about the methodology underlying the Dental Health Professional Shortage Area (Dental HPSA) designation process and whether the Dental HPSAs are an accurate reflection of access to dental professionals in a specific are within the United States.

The AGD does not agree with conclusions some assert that that the Dental HPSA designation demonstrates conclusively that more that 45 million Americans live in dental health professional shortage areas "where there are not enough dentists to adequately serve the population," and "an aging and shrinking dental workforce and a low number of graduating dental students wishing to practice in rural or urban underserved areas contribute to dental HPSAs."

We believe that the methodology by which a Dental HPSA is designated may be systemically flawed, which results in designations that are illogical and inconsistent with the actual level of access to dental care in affected communities.

We would welcome the opportunity for a discussion with the agency to learn more about the Dental HPSA designation process, the methodology used in the Dental HPSA scoring, and how a Dental HPSA designation is used in the grant process – a discussion that goes beyond what is available on the HRSA's website.

I appreciate your consideration of this request and HRSA's continued support for oral health.

Sincerely,

onnes L. White, Q. D.S. F.A.G.R.

Connie White, D.D.S., FAGD President Academy of General Dentistry