February 24, 2020

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 area within the United States.

The AGD does not agree with conclusions some assert that that the Dental HPSA designation demonstrates conclusively that more than 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,

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