

September 27, 2011

Secretary Kathleen Sebelius  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

**Re: ACA Pediatric Dental Benefit Design Consensus Statement**

Dear Secretary Sebelius:

As organizations concerned with children's health, we are pleased that the essential pediatric benefit mandated by the Patient Protection and Affordable Care Act (ACA) includes dental coverage. We are also pleased that children will receive preventive oral health services, including risk assessment and anticipatory guidance, consistent with the Health Resources and Services Administration's comprehensive guidelines for infants, children, and adolescents, (Bright Futures) in section 2713 of the Affordable Care Act. As you consider the implementation of this benefit, the undersigned organizations support a definition of the pediatric dental benefit that reflects current science, best practice, and professional recommendations for children's dental care.

We call upon Federal regulators, in defining the essential pediatric benefit in ACA, to endorse a set of dental services that reflect current professional and government evidence-based guidelines and recommendations that are designed to improve oral health outcomes in children.

These evidence based guidelines and recommendations include:

1. The American Dental Association's Center for Evidence-Based Dentistry recommendations on use of fluorides and dental sealants;
2. The joint US Food and Drug Administration-American Dental Association *Guide to Patient Selection for Dental Radiographs*;
3. The American Academy of Pediatric Dentistry's Policy on *Model Dental Benefits for Infants, Children and Adolescents and Individuals with Special Care Needs*,
4. The American Academy of Pediatrics Policy on Oral Health Risk Assessment Timing and Establishment of the Dental Home; and
5. The California Dental Association's *Caries Management by Risk Assessment* clinical guidelines.

Taken together, these evidence-based authoritative guidelines and policies promote a dental benefit that supports early, timely, and ongoing oral health care, caries risk assessment, and individualized preventive and corrective care that is tailored to a child's level of caries risk and oral health care needs.

We support a dental benefit that covers all pediatric dental services "necessary to prevent disease and promote oral health, restore oral structures to health and function, and treat emergency conditions for the attainment and maintenance of oral health." Our recommendation recognizes and conforms to the ACA stated necessity to "ensure that the scope of the essential health benefits...is equal to the scope of benefits provided under a typical employer plan."

These recommendations are predicated on three principles:

1. Effective and efficient dental care for children must be individualized according to their levels of disease risk and disease experience.
2. Existing clinical diagnostic and preventive resources should be directed so that the intensity of care received by children is tailored to their levels of disease risk and disease experience in collaboration with the child's medical home and other community health care agencies.
3. All children should receive pediatric dental services necessary to prevent disease and promote oral health, restore oral structures to health and function, and treat emergency conditions for the attainment and maintenance of oral health.

We urge your consideration of these recommendations as you move forward with crafting guidelines for the essential benefits package. We look forward to working with you to guarantee that children have the health coverage they need to meet their full potential.

Sincerely,

Agenda for Children  
American Academy of Pediatrics  
American Association for Community Dental Programs  
American Association for Dental Research  
American Association of Public Health Dentistry  
American Dental Education Association  
American Dental Hygienist's Association  
American Dental Partners  
Association of Maternal and Child Health Programs  
Association of State and Territorial Dental Directors  
California Dental Association  
Center for Oral Health  
Children Now  
Children's Dental Health Project  
Children's Health Fund  
Church Street Health Management  
Delta Dental Plans Association  
    Delta Dental of California  
    Delta Dental of Pennsylvania  
    Delta Dental of Delaware  
    Delta Dental of District of Columbia  
    Delta Dental of New York  
    Delta Dental of West Virginia  
    Delta Dental Insurance Company (DDIC)  
        Alabama  
        Florida  
        Georgia  
        Louisiana  
        Mississippi  
        Montana  
        Nevada

Texas  
Utah  
Puerto Rico  
Delta Dental of Puerto Rico  
Delta Dental of Michigan, Inc.  
Delta Dental of Indiana, Inc.  
Delta Dental of Ohio  
Delta Dental of Tennessee, Inc.  
Delta Dental of Kentucky, Inc.  
Delta Dental of New Mexico, Inc.  
Delta Dental of North Carolina  
Delta Dental of Minnesota  
Delta Dental of Nebraska  
Delta Dental of Missouri  
Delta Dental of Oklahoma  
Delta Dental Plan of Maine  
Delta Dental Plan of New Hampshire  
Delta Dental Plan of Vermont  
Delta Dental of New Jersey  
ODS Companies (Oregon)  
Delta Dental of Arizona, Inc.  
Delta Dental of Iowa  
Delta Dental of Wisconsin  
Delta Dental of Illinois  
Delta Dental of Arkansas, Inc.  
Delta Dental of Colorado  
Delta Dental of Virginia  
Hawaii Dental Service  
Delta Dental of Rhode Island  
Delta Dental of South Dakota  
Delta Dental of Wyoming  
Delta Dental of Idaho  
Delta Dental of Kansas, Inc.  
Delta Dental of Massachusetts, Inc.  
Washington Dental Service  
DentaQuest  
Dental Trade Alliance  
Families USA  
Family Voices  
First Focus  
Florida Association of Community Health Centers  
Florida Oral Health Coalition  
Health Action New Mexico  
Health Care for All  
Health Care Foundation of Greater Kansas City  
Iowa Public Health Association  
Kansas Action for Children & Voices for Children Foundation  
Kool Smiles  
Maine Dental Access Coalition  
Maryland Dental Action Coalition  
Massachusetts Oral Health Advocacy Taskforce

Medicaid SCHIP Dental Association  
Methodist Healthcare Ministries of South Texas  
National Assembly on School-Based Health Care  
National Association of Children's Hospitals  
National Association of Community Health Centers  
National Health Law Program  
National Network for Oral Health Access  
Oral Health Colorado  
Oral Health Kansas  
Pennsylvania Coalition for Oral Health  
REACH Healthcare Foundation  
Rhode Island KIDS COUNT  
The Black Children's Institute Of Tennessee  
The Connecticut Health Foundation  
The National Alliance to Advance Adolescent Health  
Universal Health Care Action Network Ohio  
University of California San Francisco, School of Dentistry  
Voices for America's Children  
Washington State Oral Health Coalition  
West Virginia Oral Health Coalition  
Wisconsin Oral Health Coalition  
W.K. Kellogg Foundation