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