

April 21, 2023

Centers for Medicare & Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Attention: OMB Control Number: 0938-0568
Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

RE: Supporting Statement B For Revision of Currently Approved Collection:
Medicare Current Beneficiary Survey (MCBS)

The Dental Quality Alliance (DQA) appreciates the opportunity to comment on the inclusion of five items of the Oral Health Impact Profile (OHIP) instrument to the Health Status and Functioning Questionnaire (HFQ).

We commend the efforts of CMS to include oral health measures in the HFQ. Oral health is critical to nutrition, well-being and overall quality of life. Age-related oral health changes in older adults have often been associated with impaired masticatory and nutritional problems, negatively impacting quality of life.¹ Having a better understanding of their dental needs by the healthcare provider is not only of great importance for advancing improvement in the oral healthcare quality and coordinated care delivery among this population, but also provides insights and facilitates the use of evidence in the policy-making process. We recognize that the OHIP-5 validated instrument allows for assessment of patient-reported oral health quality of life over time and changes in oral health status for the Medicare population.² More specifically, the OHIP-5 allows for health-related quality of life assessments in the areas of oral functioning, orofacial pain, orofacial appearance, and psychosocial impact of oral health conditions.³

We support the inclusion of OHIP-5 in the HFQ as an innovative advancement with the potential to improve oral health care delivery and to drive quality improvement. Because these questions are newly introduced into the HFQ, the DQA urges the CMS to consider collaborating with DQA to ensure that the implementation of these questions can be effectively used to drive quality improvement. The DQA welcomes the opportunity to evaluate with CMS how the OHIP questions can be used as performance-based measures in a range of quality improvement applications.

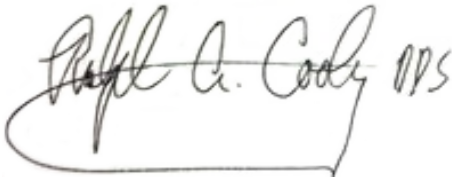
Since being convened by the American Dental Association at the request of the CMS, the DQA has been committed to pursuing coordinated and meaningful measurement for over ten years. DQA is the only comprehensive multi-stakeholder organization in dentistry that develops dental quality measures through a

consensus-based process. Thirty-three organizations with oral health experience participate in the DQA, along with a public member.

Measurement that is aligned across public and private sectors and harmonized across different settings and levels of reporting can help pave the way to improvement without being overly burdensome. To this end, the DQA encourages collaboration in tailoring this tool and other instruments to develop a set of patient-reported outcome quality measures that are supported by strong scientific evidence and further tested for validity, feasibility, reliability and usability to improve care effectiveness, quality, and patient experience.

The DQA appreciates consideration of these comments. If you have any questions, please contact the DQA at dqa@ada.org.

Sincerely,



Ralph A. Cooley, DDS
Chair, DQA

References:

¹ Janto M, Iurcov R, Daina CM, Neculoiu DC, Venter AC, Badau D, Cotovanu A, Negrau M, Suteu CL, Sabau M, Daina LG. Oral Health among Elderly, Impact on Life Quality, Access of Elderly Patients to Oral Health Services and Methods to Improve Oral Health: A Narrative Review. *J Pers Med*. 2022 Feb 28;12(3):372. doi: 10.3390/jpm12030372. PMID: 35330372; PMCID: PMC8950250.

² Naik A, John MT, Kohli N, Self K, Flynn P. Validation of the English-language version of 5-item Oral Health Impact Profile. *J Prosthodont Res*. 2016 Apr;60(2):85-91. doi: 10.1016/j.jpor.2015.12.003. Epub 2016 Jan 11. PMID: 26795728; PMCID: PMC4841723.

³ <https://www.cms.gov/files/document/mcbs-data-highlight-utilization-dental-vision-and-hearing-care-services-2019.pdf>