From:	Dafflitto, Scott (HRSA)
To:	Duplantier, Daniel (HRSA)
Cc:	HRSA BPHC OAA
Subject:	FW: COMMENT #12: Response to the Propose change in HRSA UDS dental measure
Date:	Monday, August 26, 2019 2:11:47 PM
Attachments:	image001.png

From: HRSA Paperwork <paperwork@hrsa.gov>
Sent: Monday, August 26, 2019 2:08 PM
To: Dafflitto, Scott (HRSA) <SDafflitto@hrsa.gov>
Cc: HRSA Paperwork <paperwork@hrsa.gov>
Subject: COMMENT #12: Response to the Propose change in HRSA UDS dental measure

Ellie Bowman
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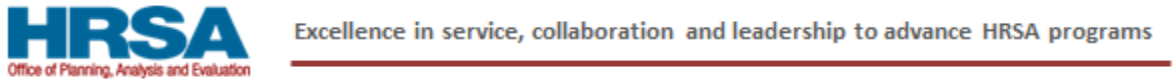

From: Mark Koday <MarkK@yvfwc.org>
Sent: Monday, August 26, 2019 1:58 PM
To: HRSA Paperwork <paperwork@hrsa.gov>
Cc: Olivares, Carlos <carloso@yvfwc.org>; Stephen Davis <StephenD@yvfwc.org>
Subject: Response to the Propose change in HRSA UDS dental measure

I am the Chief Dental Officer of the Yakima Valley Farm Workers Clinic. We are one of the largest Community Health Centers in the country serving low income populations in Washington and Oregon. We have 13 dental clinics and are projected to service almost 160,000 dental encounters this fiscal year.

I am writing to express my organization's opposition to the proposed UDS dental measure change. There are a number of solid reasons for opposing this including:

1. The specific measure recommended by HRSA is not a validated measure. One varnish application in a year has not been proven to be an effective preventative measure. Including an unproven measure, will promote health centers to invest a great deal of time, energy and funds into a measure that we have no proof will provide any benefits at all. Our funding is already stretched in our attempts to improve oral health and it is our believe that we should only concentrate on procedures that we know are effective. Anything less is a waste of valuable resources.

2. Health centers have invested a lot of time and money in developing the ability to track the sealant measure. As you know, starting this year, all UDS metric tracking must now come from automated reports. Producing these reports to achieve that is costly in both finances and in precious IS time. We would be starting all over again with a new metric. If we knew that it would change oral health this would be an acceptable move but as already stated, that claim cannot be made.
3. Dental sealants are one of the few proven evidenced based procedures in dentistry. The health centers across the country have been able to move the sealant measure very well over the years. There's no reason to stop moving a validated, evidenced based measure and replacing it with one that's not validated. I do understand that HRSA wants to align all health measures with other federal agencies. While this is a good goal, replacing an evidence based with an unvalidated one to accomplish that makes little sense.

We are asking HRSA not to make this change but if you feel an absolute need to include this fluoride measure, please keep the sealant measure as well. If HRSA believes oral health is important, my hope is you feel it is also worth more than one measure.
Thanks, Mark

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