From:	HRSA BPHC OAA
To:	Duplantier, Daniel (HRSA)
Cc:	HRSA BPHC OAA
Subject:	FW: COMMENT # 13 on CMS 74v9 _Replacing sealant measure with fluoride varnish
Date:	Monday, August 26, 2019 2:54:23 PM
Attachments:	image001.png

From: HRSA Paperwork <paperwork@hrsa.gov>
Sent: Monday, August 26, 2019 2:48 PM
To: Dafflitto, Scott (HRSA) <SDafflitto@hrsa.gov>
Cc: HRSA Paperwork <paperwork@hrsa.gov>; HRSA BPHC OAA <bphcoaa@hrsa.gov>
Subject: COMMENT # 13 on CMS 74v9 _Replacing sealant measure with fluoride varnish

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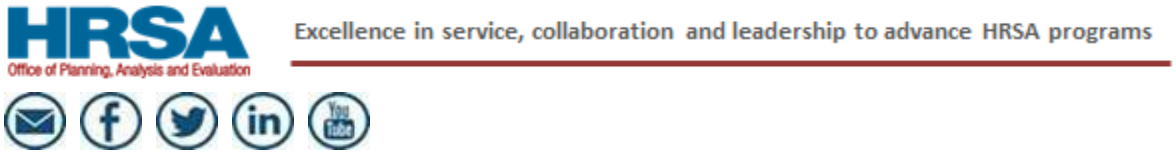

From: Huong Le <huongle@ahschc.org>
Sent: Monday, August 26, 2019 2:35 PM
To: HRSA Paperwork <paperwork@hrsa.gov>
Subject: Comments on CMS 74v9 _Replacing sealant measure with fluoride varnish

Replacing Dental Sealants for Children Between 6-9 years with CMS74v9 Primary Caries Prevention Intervention as Offered by Primary Care Providers, Including Dentists: The replacement measure, which is the percentage of children age 0-20 years who received a fluoride varnish application, is applicable to a broader patient population than the use of dental sealants, more applicable to primary care settings by measuring oral health activities that health centers without dentists can employ, and is part of the CMS Merit-based Incentive Payment System quality payment program measure set.
This change makes no sense and will have no impact in the overall health outcomes of the vulnerable patients we serve.
Sealant measure has been tested for reliability, validly and feasibility. Fluoride varnish application once a year does absolutely nothing to change the outcomes nor behaviors.
1. The specific measure recommended by HRSA is not a validated measure. One varnish application in a year has not been proven to do anything. The current UDS sealant measure is a validated measure and an evidenced base procedure.
2. Health centers have invested a lot of time and money in developing the ability to track the sealant measure. We would be starting all over again with this new metric.
3. The health centers across the country have been able to move the sealant measure very well

over the years. As you know, sealants are one of few evidence based procedures we have in dentistry. There's no reason to stop all our efforts in moving a validated measure and replacing it one that's not validated.

Huong Le, DDS. MA I *Chief Dental Officer*

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