

To: President-elect Biden, Vice President-elect Harris, and the Biden-Harris Transition team
Date: December 16, 2020
Re: Recommendations to champion oral health for everyone in America

Introduction

We are honored to share policy recommendations for your new administration to provide leadership around a critical health issue: oral health. Dental disease has lifelong health and economic consequences for people and communities. The organizations signed below are members of the Oral Health Progress and Equity Network (OPEN), a national network of over 2,200 members taking on America's oral health challenges so that everyone has an equitable chance to thrive. They also include stakeholders that share our interest in ending oral health inequities. **Listed below are immediate actions your administration can take and opportunities to lead on legislation that will end harmful disparities and improve oral health for everyone.**

Immediate, administrative actions

1. Extend Medicare coverage to medically necessary oral health care
2. Expand the dental workforce

Legislative priorities

1. Integrate dental coverage into Medicare Part B
2. Engage oral health providers to fight COVID-19 while increasing access to pandemic-era care
3. Preserve dental coverage for people who rely on Medicaid
4. Secure comprehensive, affordable oral health coverage for all

Background: Oral health matters to COVID-19 relief and the Nation's future health and security

Oral health is essential for overall health. Its importance has become even more clear amid the pandemic—oral health is directly related to COVID-19 outcomes. Among people with COVID-19, those with poor oral health tend to get sicker and are more likely to die. Moreover, when basic oral health care is out of reach, many people have no choice but to turn to expensive emergency room settings for dental relief further straining hospital capacity. Longstanding evidence shows that tooth decay risks our physical, mental, and economic well-being. A recent survey of middle-aged adults revealed that nearly four in ten had dental problems within the past two years that caused pain, difficulty eating, and missed work. Nearly one in six children has untreated tooth decay, which can harm school success and healthy development. Children of color are disproportionately harmed and have higher rates of tooth decay due to systemic racial inequities in health care. Americans are roughly four times more likely to lack dental insurance than medical insurance. Many Americans cannot access regular dental care, which has a significant impact on their overall health. When policy and other barriers keep people from achieving good oral health, it also jeopardizes their economic security and that of their families and states.

As incoming President and Vice President, and with a new administration, you have an unprecedented opportunity to address these unmet needs and become the first oral health champions in the White House.

Priorities for Immediate Administrative Action

We encourage the Biden-Harris administration to move toward the following two administrative opportunities by convening a national summit on oral health in the first 100 days of the administration. In the longer-term, we ask that you include oral health experts in all health policy commissions, task forces, and meetings hosted by the Administration to promote oral health's connection to overall health.

Extend Medicare Coverage for Medically Necessary Oral Health Care

Unresolved dental conditions can preclude, delay, or jeopardize critical medical treatments. For example, it may risk care for people with cancer who need chemotherapy; others who need an organ or stem cell transplant, or a heart valve repaired or replaced; and those needing surgery for an orthopedic prosthesis. It can also risk a person's ability to keep an autoimmune disease in check.

To avoid these harms, we urge the new Administration to exercise its existing statutory authority to more broadly extend Medicare coverage to oral and dental care that is integral to covered medical treatment. Such evidence-based coverage would reduce the risk of costly medical complications. It would lower the resulting financial burden on people enrolled in Medicare, the federal program itself, and taxpayers. OPEN, along with a broad consortium of over 136 dental, medical, and patient advocacy organizations— including AARP and the American Medical Association — firmly recognizes the important clinical need for this coverage, as well as the potential for program savings

Expand the Dental Workforce

Expanding oral health coverage should be coupled with policies that ensure equitable access to oral health providers, regardless of where a person lives. We appreciate that a Biden-Harris administration will prioritize additional investment in the National Health Service Corps and establish a U.S. Public Health Job Corps. These actions will be crucial to improving access to medical and dental care, while creating more jobs in communities that need them most. Despite these initiatives, too many people will still lack access to a provider. To help meet demand, these and other federal entities would greatly benefit from policies that expand the dental care team to include additional provider types such as dental therapists, advanced practice dental hygienists, and community health workers.

The Biden-Harris administration has a unique opportunity to advance policies that end scope of practice restrictions; facilitate licensing across state lines; and allow for the deployment of health and dental professionals in community-based settings and existing touchpoints for marginalized communities.

Opportunities to Lead on Key Legislation

In addition to the steps the Biden-Harris administration can take immediately, we encourage your support for critical legislation. The following priorities would improve access to oral health care in Medicare, Medicaid, and broader health care initiatives.

Integrate Dental Coverage in Medicare Part B

Traditional Medicare currently does not cover routine dental care; the majority of people who rely on Medicare have no dental coverage at all (Drilling Down on Dental Coverage and Costs for Medicare Beneficiaries | KFF). Federal policymakers can fill this coverage gap and ensure our nation's older adults and people with disabilities can get the care they need by adding comprehensive oral health coverage to Medicare Part B. We urge you to work with Congress to advance such a policy that is grounded in health equity. The House-passed Elijah E. Cummings Lower Drug Costs Now Act (H.R. 3), offers a strong, bipartisan framework for improving Medicare oral health coverage, though the proposed benefit should be strengthened even further.

Engage Oral Health Providers to Fight COVID-19 while Strengthening Access to Dental Care

This current public health crisis is straining our nation's oral health care system. It is leaving millions of Americans without access to essential health care necessary to combat COVID-19, as dental disease can make coronavirus complications worse. Unfortunately, people who face the most significant barriers to oral health are also those most disproportionately affected by COVID-19 and its economic harms.

The incoming Biden-Harris administration should engage the oral health workforce to stop the spread of COVID-19, while also working with Congress to increase access to oral health care. In particular:

- ***A COVID-19 vaccine strategy should include oral health providers***

This moment presents an opportunity to integrate dental and medical care. As the nation prepares for the release of COVID-19 vaccines, licensed oral health professionals can play a role in vaccine administration. This capacity should be built into the vaccine rollout strategy.

■ *Federal policymakers must invest in oral health infrastructure*

Our nation's oral health needs cannot be met without additional support for the oral health care system and state infrastructure, especially as the pandemic and its economic consequences wear on (Now is the Time for Oral Health Coverage: A Call to Action for All Health Advocates). In particular, we urge federal action to stabilize state budgets and state Medicaid programs. Federal policymakers must also provide immediate support to state health departments and oral health programs by establishing an oral health infrastructure fund. This fund would allow states to respond to crisis-related oral health needs. This may include providing direct safety-net care to uninsured individuals and collecting relevant data. It could also support investments in telehealth technology to safely reach patients, including the more than 65 million individuals living in dental professional shortage areas.

Preserve Oral Health Coverage for Families who Rely on Medicaid

As states continue to face extremely tight budgets, they will likely be forced to make cuts. Many states may end dental coverage for adults who rely on Medicaid for their health. While this coverage was previously protected under the "Maintenance of Effort" provision in the Families First Coronavirus Response Act, the Center for Medicare and Medicaid Services issued an interim final rule on November 2, 2020 allowing these benefits to be slashed. We urge you to reverse this rule immediately.

We also encourage you to work with Congress to make two crucial updates to the federal Medicaid matching rate (FMAP):

- Increase FMAP funding for Medicaid as part of any COVID-19 relief legislation. Increasing the FMAP by at least 12 percent will allow states to provide health coverage for the 72 million individuals currently covered by Medicaid. This step is vital to stabilize state budgets and protect access to essential oral health care.
- Increase the FMAP for adult dental services by five percent to ensure that care remains available.

Taken together, these supports would allow state Medicaid programs to maintain coverage and respond to increasing demand in the months ahead.

In the longer term, we hope that you will work with Congress to pass legislation that makes oral health coverage a permanent part of Medicaid coverage for children and adults. This will ensure that states do not cut this critical care every time budgets are tight.

Include Comprehensive, Affordable Oral Health Coverage for All

Our nation's current crises have shined a light on inequities in health care that undermine the ability of millions of people across America to lead healthy lives. Oral health remains among the deepest disparities in communities of color, vulnerable age groups, people with disabilities, and underserved geographic regions – given inadequate oral health care coverage and access. Poor oral health, in turn, can significantly affect an individual's physical, mental, and financial health.

The incoming Biden-Harris administration can make real progress toward ending oral health disparities and helping every person achieve good oral health, no matter who they are, how much money they have, or where they live. We urge you to work with Congress to ensure that comprehensive, affordable oral health coverage for all is part of any health care reforms, including in the Public Option, Medicaid, Medicare and VA benefits. Federal policymakers can advance solutions to ensure equitable access and improve oral health and overall health for all.

Thank you for considering our recommendations. We look forward to partnering with you to improve America's oral health and prosperity.

Sincerely,

The Oral Health Progress and Equity Network (OPEN)

National Organizations

- Advancing Oral Health in the Safety Net, LLC, Smithfield, RI
- Alliance for Retired Americans, Washington, DC
- Alliance of Claim Assistance Professionals, Stamford, CT
- American Association of Public Health Dentistry, Springfield, IL
- American Dental Hygienists' Association, Chicago, IL
- American Institute of Dental Public Health, San Antonio, TX
- Association of State and Territorial Dental Directors, Reno, NV
- Center for Medicare Advocacy, Washington, DC
- Children's Health Fund, New York, NY
- Community Catalyst, Boston, MA
- DentaQuest Partnership for Oral Health Advancement, Boston, MA
- Families USA, Washington, DC
- Justice in Aging, Washington, DC
- Long Term Care Community Coalition, New York, NY
- Long term care Ombudsman, Fort Myers, FL
- Mary's House for Older Adults, Inc., Washington, DC
- MaryCatherine Jones Consulting, LLC, Tallahassee, FL
- MedBillsAssist, Stamford, CT
- National Association of Community Health Centers, Bethesda, MD
- National Association of Nutrition and Aging Services Programs, Washington, DC
- National Consumer Voice for Quality Long-Term Care, Washington, DC
- National Dental Association, Greenbelt, MD
- National Network of Public Health Institutes, Washington, DC
- National Rural Health Association, Washington, DC
- Oral Health Nursing Education and Practice Program (OHNEP), New York, NY
- Oral Health Progress and Equity Network, Inc., Washington, DC
- Project Accessible Oral Health, Albertson, NY
- PWF Consulting, Midlothian, VA
- Santa Fe Group, New York City, NY
- SFITCH Consulting LLC, Healdsburg, CA
- Society of American Indian Dentists, Las Vegas, NV
- The Gerontological Society of America, Washington, DC
- The National Interprofessional Initiative on Oral Health, Englewood, CO

State, Local, Education & Tribal Organizations

Alaska

- Alaska Primary Care Association, Anchorage, AK

Arizona

- Asian Pacific Community in Action, Phoenix, AZ
- Children's Action Alliance, Phoenix, AZ
- Mountain Park Health Center Phoenix, AZ
- National Asian Pacific American Women's Forum Arizona Chapter, Phoenix, AZ
- Native American Connections, Phoenix, AZ

Arkansas

- Arkansas Medical Dental & Pharmaceutical Association (AMDPA), Little Rock, AR
- Arkansas Oral Health Coalition, Little Rock, AR

California

- California Health Advocates, Sacramento, CA
- California Pan-Ethnic Health Network, Oakland, CA
- Catholic Charities / MLLTCO Program, Sonoma, CA
- Children Now, Oakland, Sacramento and Los Angeles, CA
- CPEHN, Oakland, CA
- Dientes Community Dental Care, Santa Cruz, CA
- HHSA/Public Health/Community Wellness/Oral Health Program, Ukiah, CA
- Marin Healthcare Navigation, Tiburon, CA
- Strategic Concepts in Organizing and Policy Education (SCOPE), Los Angeles, CA
- University of the Pacific Dugoni School of Dentistry, Pacific Center for Equity in Oral Health Care, San Francisco, CA

Colorado

- Delta Dental of Colorado Foundation, Denver, CO

Connecticut

- The Connecticut Oral Health Initiative, Inc., Hartford, CT

Delaware

- Delaware Dental Hygienists' Association, Newark, DE

Florida

- Catalyst Miami, Miami, FL
- Florida Health Justice Project, Miami, FL
- Florida Voices for Health, Boynton Beach, FL

Hawaii

- Hawaii Children's Action Network, Honolulu, HI

Idaho

- Idaho Oral Health Alliance, Inc, Boise, ID

Illinois

- Champaign-Urbana Public Health District, Champaign, IL

Kansas

- Oral Health Kansas, Topeka, KS
- Kansas Dental Hygienists' Association, Wichita, KS

Kentucky

- Kentucky Oral Health Coalition, Louisville, KY

Louisiana

- EXCELth, Inc., New Orleans, LA
- Louisiana Dental Hygiene Association, Baton Rouge, LA
- Louisiana Primary Care Association, Baton Rouge, LA
- The Association of Community Action Partners, Baton Rouge, LA
- The Louisiana Head Start Association, Alexandria, LA
- The Louisiana Head Start Collaboration Project, Baton Rouge, LA
- West Feliciana Parish Early Head Start/Head Start, St. Francisville, LA

Maine

- Consumers for Affordable Health Care, Augusta, ME
- Maine Oral Health Coalition, Augusta, ME
- Maine Primary Care Association, Augusta, ME
- Partnership for Children's Oral Health, Yarmouth, ME
- The Bingham Program, Warren, ME

Maryland

- Maryland Dental Action Coalition, Columbia, MD

Massachusetts

- Massachusetts Advocates for Nursing Home Reform, Medford, MA

Michigan

- Detroit Community Solutions, Detroit, MI
- Michigan Oral Health Coalition, Lansing, MI
- Regional Oral Health Connection Team – OPEN, Charlevoix, Detroit, MI
- Urban Fit Kids (a/k/a JazzyKat Kids, Inc.), Detroit, MI
- Wayne County Oral Health Coalition, Detroit, MI

Minnesota

- Apple Tree Dental, Minneapolis, MN
- Children's Dental Services, Minneapolis, MN
- Minnesota Oral Health Coalition, Plymouth, MN
- West Central Initiative, Fergus Falls, MN

Mississippi

- Mississippi Oral Health Community Alliance, Jackson, MS

Montana

- Montana Primary Care Association, Helena, MT
- Women and Wellness in Dentistry, Kalispell, MT

Nevada

- Future Smiles, Las Vegas, NV

New Hampshire

- New Hampshire Oral Health Coalition, Concord, NH

New Jersey

- Advocates for Children of New Jersey, Newark, NJ
- Oral Health Coalition, Princeton, NJ

New Mexico

- First Choice Community Healthcare, Albuquerque, NM
- Health Action New Mexico, Albuquerque, NM
- New Mexico Dental Therapy Coalition, Albuquerque, NM
- NMOHC, Albuquerque, NM
- Participa!Inc. Mobile Dentistry, Bernalillo, NM
- Senior Citizens' Law Office, Inc., Albuquerque, NM

New York

- Center for Elder Law & Justice, Buffalo, NY
- New York State Oral Health Coalition, Albany, NY
- Schuyler Center for Analysis and Advocacy, Albany, NY

North Carolina

- NC Child, Raleigh, NC

Ohio

- Oral Health Ohio, Cincinnati, OH

Oklahoma

- Southern Plains Tribal Health Board, Oklahoma City, OK

Oregon

- CareWorks of Lane County, Eugene, OR
- Klamath Basin Oral Health Coalition, Klamath Falls, OR

Pennsylvania

- Achieva/Arc of Greater Pittsburgh, Pittsburgh, PA
- Bowling Business Strategies, Philadelphia, PA
- Center for Advocacy for the Rights and Interests of the Elderly (CARIE), Philadelphia, PA
- Disability Healthcare Initiative, Pittsburgh, PA
- PA Coalition for Oral Health, Delmont, PA

Rhode Island

- CareLink, East Providence, RI
- Rhode Island JAYCEE Alliance, W. Warwick, RI
- Rhode Island Oral Health Commission, Providence, RI
- RI Public Health Association, Providence, RI
- Wood River Health Services, Hope Valley, RI

Texas

- Texas Oral Health Coalition, Midland, TX

Utah

- Utah Dental Hygienists' Association, Murray, UT
- Utah Health Policy Project, Salt Lake City, UT
- Voices for Utah Children, Salt Lake City, UT

Virginia

- Eastern Shore Rural Health System, Onancock, VA
- Tri-Area Community Health, Laurel Fork, VA
- Virginia Coalition of Latino Organizations, Virginia Beach, VA
- Virginia Dental Hygienists' Association, Virginia Beach, VA
- Virginia Health Catalyst, Richmond, VA
- Virginia Organizing, Charlottesville, VA

Vermont

- Southern Vermont Area Health Education Center, Springfield, VT

Washington

- Arcora Foundation, Seattle, WA
- Statewide Poverty Action Network, Seattle, WA

West Virginia

- West Virginia Oral Health Coalition, Charleston, WV

Wisconsin

- Children's Health Alliance of Wisconsin, Milwaukee, WI
- Wisconsin Oral Health Coalition, Milwaukee, WI