



December 1, 2023

Dr. Sherin Tooks  
Senior Director  
The Commission on Dental Accreditation  
311 E Chicago Ave,  
Chicago, IL 60611

Dear Dr. Tooks,

The National Association of Community Health Centers (NACHC) and its members are grateful for your leadership in improving the quality of dental education across the United States.

Providing high-quality education and training opportunities for the healthcare workforce is a core component of our member health centers' mission of expanding access to affordable care to millions of underserved Americans. In writing to you with our members' feedback about your proposed revisions to accreditation standards for Advanced Dental Education programs, I seek to align our shared goal of enhancing healthcare quality.

Health centers serve over 31 million patients, including nearly 9 million children, 3.5 million seniors, and 400,000 veterans. As the population they serve has grown, the demand for dental care services among health center patients has grown rapidly as well. According to the Health Resources and Services Administration's (HRSA) Uniform Data System, health centers have greatly expanded (60% increase) the availability of dental services over the preceding decade. They have outperformed other outpatient care providers in expanding access, such that only 13% of health center patients experience unmet dental care needs versus over 20% at other providers.

Health centers achieved this improvement in access by investing in doubling the dental workforce from 2010 to 2021. This was made possible in part by health centers offering Advanced Dental Education Programs such as Advanced Education in General Dentistry (AEGD), General Practice Residency (GPR), and Pediatric Dentistry (PD). They relied on federal support from HRSA's Teaching Health Center Graduate Medical Education (THCGME) program to do so. While only 3.7% of the current THCGME grantees cohort offer advanced dentistry training, health centers have demonstrated a strong interest in significantly growing these opportunities. Looking ahead, 23 out of 93 Teaching Health Center Planning and Development (THCPD) Grantees (all Community Health Centers) intend to start advanced training programs in general or pediatric dentistry if Congress adequately increases THCGME funding.

I commend CODA for recognizing in the proposed standards the role Community Health Centers play in providing dental training in underserved communities. However, some health centers have expressed concerns that some of CODA's proposed changes to accreditation standards could place

an undue burden of compliance that would delay or limit their ability to start offering advanced dental training. On behalf of our member health centers I request CODA:

1. Maintain the inclusion of Community Health Centers as eligible sponsors of Advanced Dental Education Programs.
2. Add achievement of compliance with HRSA's Operational Site Visit/certification of completion of HRSA's Operational Review as being equivalent to such accreditation.
3. Strike proposed revisions to CODA standards to require that AEGD, GPR, and PD program-sponsoring health care organizations, such as Community Health Centers, must obtain a state license or federal authority or institutional accreditation to document the organization's approval to confer a credential or certificate.

By making these meaningful improvements to its proposed revisions, CODA can help remove barriers to achieving our shared goals of advancing the quality of dental education across the country and improving access to high-quality dental care. I hope that you will duly consider my comments before finalizing revisions to your accreditation standards.

NACHC and our member health centers stand ready to support you with this and other dental health workforce priorities. If you have any questions, please contact Nicholas Widmyer, Director of Federal Affairs ([NWidmyer@nachc.org](mailto:NWidmyer@nachc.org)) or Mandar Jadhav, Deputy Director of Federal Affairs ([MJadhav@nachc.org](mailto:MJadhav@nachc.org)) at NACHC.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kyu Rhee".

Kyu Rhee, M.D., M.P.P.  
President and Chief Executive Officer  
National Association of Community Health Centers