

August 3, 2022

The Honorable Jon Tester  
United States Senate  
311 Hart Senate Office Building  
Washington, DC 20510-2604

Dear Senator Tester:

On behalf of our 162,000 members, the American Dental Association (ADA) writes to comment on your legislation, S.4156, the VA Workforce Improvement, Support, and Expansion (WISE) Act of 2022. ADA is committed to greater oral health equity for our nation's veterans, and improving VA's ability to attract skilled professionals like dentists is an essential part of providing veterans with access to high quality dental care.

Secretary McDonough recently noted that burnout and a high demand for labor had caused the worst turnover rate at VA in 15 years. He went on to say that VA will need to hire 15,000 nurses over the next 5 years.<sup>1</sup> ADA would naturally also call the Secretary's attention to workforce shortages within VA dentistry, where the number of eligible veterans has increased by over 100% in the last 10 years with a corresponding increase in VA dental resources of only 10%. At a time when 80% of dentists who are currently hiring are finding the recruitment of dental hygienists and assistants to be extremely or very challenging<sup>2</sup>, VA must commit adequate resources to the VA dental workforce if it is going to meet the oral health needs of veterans.

Many of the provisions of the WISE Act were mentioned in Secretary McDonough's 10 point plan to develop the VA workforce<sup>3</sup>, such as: increasing retention bonuses and lifting caps on employees' pay; increasing opportunities to advance at VA by growing future leaders; opening the door to opportunities for higher general schedule grades and promotions; expediting the hiring process by better leveraging hiring authorities; and redesigning the national onboarding process. Some of these priorities were included in the Honoring Our Promise to Address Comprehensive Toxics (PACT) Act of 2021, which recently passed the Senate. While these provisions may increase the competitiveness of jobs at the VA, ADA would also urge you to consider the following changes to the WISE Act as you continue to work to address VA workforce issues:

Throughout the legislation, dentists and dental team members should have parity with physicians and allied medical professionals when physicians and allied medical professionals are mentioned. At various points throughout the bill, dentists and dental

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<sup>1</sup> <https://federalnewsnetwork.com/veterans-affairs/2022/02/va-rethinks-pay-benefits-for-workforce-as-agency-faces-high-employee-turnover/#:~:text=Considering%20how%20many%20agency%20nurses,that%20VA%20can't%20match.> Retrieved July 15, 2022.

<sup>2</sup> [https://www.ada.org/publications/ada-news/2021/june/dentists-face-applicant-shortages-as-they-emerge-from-covid-19-pandemic.](https://www.ada.org/publications/ada-news/2021/june/dentists-face-applicant-shortages-as-they-emerge-from-covid-19-pandemic) Retrieved July 15, 2022.

<sup>3</sup> [https://blogs.va.gov/VAntage/100113/february-2022-secretary-mcdonoughs-human-infrastructure-plan/.](https://blogs.va.gov/VAntage/100113/february-2022-secretary-mcdonoughs-human-infrastructure-plan/) Retrieved July 18, 2022.

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team members are omitted despite the inclusion of physicians and allied medical professionals.

Section 104- Payment of licensure exam costs for recipients of scholarships from Department of Veterans Affairs

ADA supports the concept of this section, which would provide payment of licensure exam costs for recipients of scholarships from the VA. However, given the shortage of dental hygienists and dental assistants, ADA asks that health profession scholarships be made available for hygienists and dental assistants and that exam costs be covered for hygienists and dental assistants. Assistance with the costs of National Board Dental Hygiene Examinations and state or regional clinical licensure exams for dental hygienists, and with the cost of the Dental Assisting National Board Certified Dental Assistant exam, would make VA employment more attractive for hygienists and dental assistants.

Sec. 105-Improvement of workforce training and team models to meet the needs of older veterans

ADA supports team based models of care, but also believes that community dental health coordinators (CDHCs) play a critical role in connecting people to care<sup>4,5</sup>, especially those in rural areas. Additionally, geriatric patients, especially those who may have memory loss and dementia, are at an increased risk of several oral disease. The Rural Interdisciplinary Team Training program and the Geriatric Patient Aligned Care Team Model should include CDHCs in order to remove barriers to access to dental care for rural and geriatric veterans, as well as those struggling with memory loss.

Sec. 222-Expansion of reimbursement of continuing professional education fees

While the ADA would welcome an expansion of reimbursement of continuing professional education fees for dentists and dental team members, it cannot support this section as currently written. First, most general practitioner dentists would not qualify for reimbursement under this section because they do not have additional board certification from organizations like the American Board of General Dentistry beyond what is required for graduation from dental schools and for state licensure. The section should be changed to allow all dentists to be reimbursed for continuing professional education fees, just as it allows all physicians to be reimbursed.

Second, while this section expands reimbursement for continuing professional education fees to allied medical professionals like advanced practice registered nurses and physician assistants, it does not include reimbursement for dental team members. The section should be amended to reimburse fees for dental hygienists and dental assistants.

The ADA applauds your leadership on these crucial VA workforce issues, and stands ready to work with you to improve VA's dental workforce so that veterans can have access to the best dental care. Should you have any questions, please contact Ms. Megan Mortimer at 202-898-2402 or [mortimerm@ada.org](mailto:mortimerm@ada.org).

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<sup>4</sup> <https://www.ada.org/resources/community-initiatives/action-for-dental-health/community-dental-health-coordinator>. Retrieved July 20, 2022.

<sup>5</sup> <https://www.hhs.gov/about/news/2022/04/15/hhs-announces-226-million-launch-community-health-worker-training-program.html>. Retrieved July 20, 2022.

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Sincerely,

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President

Raymond A. Cohlma, D.D.S.  
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