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March 10, 2014

Ms. Edith Ramirez
Chairwoman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Chairwoman Ramirez:

On behalf of the American Dental Hygienists' Association (ADHA), I write to express profound appreciation for the December 2, 2013 comment letter submitted by the Federal Trade Commission on the Accreditation Standards for Dental Therapy Education Programs proposed by the American Dental Association Commission on Dental Accreditation (CODA).

We understand that the FTC letter, which as you know contained fifteen pages of very carefully considered and thoughtful comments, along with extensive and detailed footnotes, was a "game changer" during the CODA deliberations. Clearly, the draft standards issued before the FTC comments and the draft standards released after the FTC comments reflect significant change that was specifically responsive to the FTC comments. The work of the FTC and, in particular, the work of the Office of Policy Planning, the Bureau of Economics and the Bureau of Competition is to be saluted and is the work of Andy Gavil, Tara Koslov, Karen Goldman, Chris Grengs and Patricia Schultheis.

Indeed, we believe that when future health care workforce historians look back on the history of the oral health workforce, the FTC comment letter of December 2, 2013 will be viewed as the tipping point for a new profession, the oral health mid-level provider, and the introduction of more robust competition in the oral health care marketplace.

ADHA and dental hygienists across the country greatly appreciate the FTC's work in combatting the significant obstacles that millions of Americans face in obtaining oral healthcare, particularly poor children, the elderly, and members of racial and ethnic minority groups. We view the FTC as the protector of and advocate for those in need of oral health care and for those, including dental hygienists, who seek to open up additional entry points into the oral health care delivery system and to practice to the full extent of their education and experience.

We are very pleased that the FTC has announced a public workshop, "Examining Health Care Competition," on March 20-21, 2014 to study activities and trends that may affect competition in

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the evolving health care industry, including topics relating to professional regulations and innovations in health care delivery, topics of keen interest to the dental hygiene community and all those who seek to increase access to oral health care. It was heartening to read the specific mention of the oral health care delivery system and oral health care providers in the *Federal Register* notice announcing the workshop. We particularly encourage the workshop to carefully examine the use of regulations relating to scope of practice, supervision, and settings, in order to restrict access to care in the oral health sector; and to examine the parallels between the successful efforts to create the nurse practitioner in the medical field and the ongoing efforts to create a mid-level provider in the oral health field as well as the correlation between a progressive state scope of practice for dental hygienists and increased access to care. It would also be useful to examine why some efforts to stifle competition in the oral health sector have been successful despite the lack of an evidence base to support those efforts. ADHA Executive Director Ann Battrell and ADHA Governmental Affairs Director Ann Lynch will personally attend the workshop, and ADHA will submit more extensive comments prior to the April 30, 2014 deadline.

With the continued willingness of the FTC to scrutinize the oral health sector, we look forward to a future where the oral health marketplace is free from the constraints of anti-competitive behavior so that access and quality will improve and cost will decrease, and we know that the FTC is essential to those efforts. As the links between oral health and total health continue to emerge, it is increasingly important to increase access to and coverage for oral health care services.

ADHA is the largest national organization representing the nation's more than 150,000 licensed dental hygienists. Dental hygienists are primary care providers who are licensed in each of the fifty states and the District of Columbia. ADHA is and will continue to be committed to better oral healthcare for all and advocates in support of expanding access to care for underserved populations and maximizing coverage for oral health services.

Thank you for your continued support for improving the nation's oral health through promoting competition in the oral health marketplace. If you require any additional information, or if you have questions, please contact Ann Battrell at 312.440.8911 or annb@adha.net.

Sincerely,

Denise Bowers, RDH, PhD
ADHA President

Ann Battrell, RDH, MSDH,
ADHA Executive Director

CC: Kelli Swanson Jaecks, MA, RDH, ADHA President-Elect
Ann Lynch, ADHA Governmental Affairs Director
Pamela Steinbach, ADHA Education Director
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