

January 6, 2025

U.S. Department of Veterans Affairs  
Veterans Health Administration, Office of Regulations  
Docket: VA-2024-VACO-0001-0621  
Subject: Comments on Proposed National Standard of Practice for VA Dental Hygienists

Dear Veterans Health Administration,

The American Dental Hygienists' Association (ADHA) is the largest national organization representing the professional interests of more than 220,000 dental hygienists in the U.S. We believe dental hygienists are vital contributors to the broader health care delivery system, working to improve the public's oral and overall health. Additionally, we support dental hygienists serving VA facilities, providing preventive and therapeutic oral health services to those individuals who have served our country and deserve access to high-quality oral health care.

ADHA appreciates the opportunity to comment on the Proposed National Standard of Practice for VA Dental Hygienists. This initiative represents a significant step toward ensuring consistency, equity, and excellence in the delivery of oral health care for veterans. Below, we address the specific points raised in the Request for Information (RFI) and provide feedback to support VA in finalizing and implementing the proposed standard.

ADHA supports the Proposed National Standard for VA Dental Hygienists and agrees that VA's assessment of state-level permissions and restrictions accurately reflects current practices. ADHA recommends ongoing review of state level changes and continues to advocate for the full utilization of dental hygienists.

The Proposed National Standard for VA Dental Hygienists aligns closely with the policies and values of the ADHA. We support the following elements of the proposed standard:

- **Empowering Dental Hygienists to Practice to Full Scope:** ADHA supports allowing VA dental hygienists to perform all duties covered by their license and credentialing standards, maximizing their contributions to oral health care delivery.
- **Full Utilization of Dental Hygienists:** ADHA advocates for amending dental hygiene and dental practice acts to ensure the full utilization of dental hygienists in all settings.
- **Evidence-Based, Patient-Centered Practice:** ADHA champions evidence-based, patient- and client-centered dental hygiene practices.

In addition, ADHA's policies further underscore our support for the proposed standard.

- **Advocacy for Comprehensive Care:** ADHA advocates for equitable, comprehensive, evidence-based, interprofessional, preventive, restorative, and therapeutic care for all individuals.

- **Commitment to Oral Health Equity:** ADHA affirms its support for optimal oral health for all people and is committed to collaborative partnerships and coalitions that utilize an oral health equity framework to improve access to care.
- **Support for Accessible, Quality Care:** ADHA supports the availability and accessibility of high-quality, cost-effective oral health care.
- **Scaling as an Advanced Skill:** ADHA asserts that scaling procedures require advanced instrumentation, assessment, and critical thinking skills. These procedures should be performed exclusively by licensed dental practitioners who have completed this advanced education at an accredited institution and have direct access to the public. Other dental professionals aspiring to perform scaling procedures should have similar educational experience and demonstrate competence.
- **Reaching At-Risk Populations:** ADHA supports comprehensive oral health programs and services designed to reach at-risk populations.

We encourage VA to incorporate these principles into the final standard to ensure the highest level of care for veterans. The American Dental Hygienists' Association appreciates and supports VA's efforts to establish a National Standard of Practice for VA Dental Hygienists. This standard represents a significant step toward ensuring consistency and equity in the delivery of oral health care for veterans. ADHA is committed to supporting initiatives that empower dental hygienists to practice to the full extent of their education and training, benefiting both providers and the individuals they serve. We encourage VA to continue engaging with professional organizations like ADHA to ensure the standard reflects current evidence-based practices and supports dental hygienists in providing the highest quality of care.

ADHA looks forward to further collaborating with VA and other stakeholders to ensure the successful implementation of this standard. Should you require additional information or wish to discuss our comments further, please do not hesitate to contact us.

Sincerely,



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