Dear Strategic Planning Team:

The American Association for Dental Research (AADR) welcomes the opportunity to provide comments on the Department of Health and Human Services’ (HHS) Draft Strategic Plan FY 2018-2022. AADR represents 3,700 individual and 103 institutional members working throughout oral, dental and craniofacial research.

We commend HHS for its effort to develop a plan that aims “to address complex, multifaceted, and evolving health and human services issues.” Upon review, AADR believes there is much to applaud in the FY 2018-2022 plan – from its call to improve data collection methodologies and systems to its inclusion of improving access to oral health services in underserved and rural communities.

On a systemic level, we appreciate the strategic plan’s emphasis on the promotion of evidence-based prevention and practices to achieve better health outcomes. As the professional home for dental research, we know that the promotion, adoption and application of data and evidence is necessary for achieving safer, higher quality care that is more affordable, accessible and equitable.

With respect to our field, AADR appreciates HHS referencing oral health throughout the framework, particularly as part of the first strategic goal of reforming, strengthening and modernizing the national health care system. As we think about how best to treat patients and improve health care outcomes, we must ensure that oral health is considered as an integral part of medical and other types of care. Not only does research indicate that oral conditions have systemic health connections – such as research indicating that periodontal disease may be associated with heart disease, diabetes or stroke – but dentistry is also increasingly involved in the delivery of patient care, namely in complex multidisciplinary cases as well as in helping to identify early signs of oral cancers, which have high morbidity and mortality. We also applaud the inclusion of strategies that promote healthier choices that have a direct impact on oral health, including encouraging healthy beverage consumption and reducing tobacco-related death and disease.

AADR is pleased to submit the following opinions and suggestions for your consideration as you work to finalize this iteration of the HHS strategic plan:

**Strategic Goal 1: Reform, Strengthen, and Modernize the Nation’s Health Care System**
Just as strategic goal one recommends supporting preventive care services, such as screenings and immunizations, AADR would also encourage HHS to highlight preventive oral health care among its strategies. Effective disease prevention measures already exist for a number of dental diseases, including the use of fluorides and dental sealants to prevent dental caries (i.e., cavities or tooth decay). Yet, despite their being largely preventable, dental caries remain the most common chronic disease of 6- to 11-year-old children and is four times more common than asthma among adolescents ages 14 to 17.¹ Targeting preventive oral health care would not only lead to healthier smiles and individual well-being, but could also result in significant costs saved.

However, AADR recognizes that it is not enough to promote oral health care; we must also facilitate access to care. For this reason, AADR appreciates HHS's calls to:

- Support research to provide evidence on how to ensure access to a range of health insurance coverage for adults and children, including oral health insurance coverage (Objective 1.3);
- Improve access to oral health services in underserved and rural communities by supporting workforce issues, including addressing shortages and ensuring equitable distribution (Objective 1.4); and
- Examine state and tribal models that may allow for increased options for providers to care for patients (Objective 1.4).

**Strategic Goal 2: Protect the Health of Americans Where They Live, Learn, Work, and Play**

As stated in the strategic plan, “Promoting public health is more than preventing disease;” it is also about helping people take a stake in their own care. Therefore, we applaud HHS’s many proposed strategies to build and evaluate health literacy skills as well as the strategies aimed at equipping various populations and individuals to increase control over their care. The recommendations put forth by HHS – such as to provide adolescents with information and support and to collaborate with community and faith-based organizations to support healthy lifestyle choices – have the potential to have a lasting effect and should remain an emphasis in the plan.

We are also pleased to see HHS encouraging healthy choices that have a direct impact on Americans’ oral health. First, we applaud promoting healthy beverage consumption within the strategic plan, but would note that sugary beverages affect more than obesity – they also cause tooth decay, among other health conditions. While we understand HHS’s rationale for including healthy beverage choices as part of obesity prevention measures, HHS may wish to broaden this bullet or mention beverages separately to better convey the significant impact sugary drinks play in Americans’ health.

Also related to healthy lifestyle choices, AADR is appreciative of the strategic plan’s focus on reducing tobacco-related death and disease. As part of this section, we would ask HHS that – as it works to revise the final plan – to include in its “comprehensive approach” the need for robust, evidence-based

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¹ Hygiene-related Diseases, Centers for Disease Control and Prevention. [https://www.cdc.gov/healthywater/hygiene/disease/dental_caries.html](https://www.cdc.gov/healthywater/hygiene/disease/dental_caries.html)
tobacco regulatory policy that eliminates or minimizes harm. Additionally, as part of its method to encourage tobacco users to quit, we would ask that HHS outline and consider the effects those tobacco products have on all parts of the body, including on oral health.

We know the burden of oral disease is high; it can affect our most basic human needs. Yet, the connection between oral health and overall health is often overlooked. There is a phrase “the mouth is a mirror,” indicating that oral issues may provide insight into broader illnesses and health conditions. Integrating oral health care into broader health care could benefit patients throughout the country. Therefore, we would encourage HHS to consider expanding the role of dentists so these providers can identify patients prone to certain diseases or conditions and ultimately improve patient care and outcomes.

In a similar capacity, substance abuse is often associated with oral health problems. Therefore, we commend HHS for calling for prevention, screening and early identification of mental illness and substance use disorders and would encourage it to continue examining ways to reduce their impact by funding behavioral health research as well as research for alternative treatments.

Finally, AADR would suggest that HHS – as part of its call to prepare for and respond to public health emergencies – ensures that the dental profession is represented among its task forces. Specifically, AADR recommends that HHS recruit more dental public health officers for the U.S. Public Health Service so that HHS has a dedicated ambassador for considering the role of oral health care and including it among our lines of defense in terms of disease prevention programs and the advancement of public health science related to dental, oral and craniofacial research.

Strategic Goal 3: Strengthen the Economic and Social Well-Being of Americans across the Lifespan

AADR respects HHS’s goal to improve outcomes for individuals and populations facing or at high risk for economic and social well-being challenges, as outlined in strategic goal three.

For this reason, AADR would suggest that within this iteration of the strategic plan that HHS works with Congress to ensure older American have access to oral health care. The demographic of older adults is rising, and dental care for seniors will be increasingly important. This demographic is especially prone to oral disease conditions because they grew up without the benefit of community water fluoridation and other fluoride products.2 Oral health affects quality of life and, as stated in a report from the National Center for Health Statistics with support from the National Institute on Aging, oral health problems “can hinder a person’s ability to be free of pain and discomfort, to maintain a satisfying and nutritious diet, and to enjoy interpersonal relationships and a positive self-image.”3

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Given that many older Americans lose dental benefits when they retire and that Medicare was not designed to provide routine dental care, many seniors lack access to oral health care.

**Strategic Goal 4: Foster Sound, Sustained Advances in the Sciences**

AADR is appreciative of HHS calling for an expansion of the capacity of the scientific workforce and infrastructure. As part of this, we would urge HHS to work with academic research centers, to the extent it deems fit, to address concerns over the workforce environment, including issues with burnout, lack of diversity, sexual harassment and other issues cited by researchers for leaving the scientific workforce.

We would also encourage HHS to continue exploring funding mechanisms that provide sustained, stable funding to more investigators, freeing up their time to spend on research rather than on writing and applying for additional grant funding.

With respect to investing in research, AADR applauds HHS’s sustained strategy for strengthening research capacities and reducing health disparities across all states. We also encourage HHS to continue to explore interprofessional education and collaboration. The strategic plan notes the desire to improve the quality and utility of evidence generated from HHS investments, and therefore, we would recommend that HHS ensure that it is funding the full continuum of research – from basic to clinical to health services and to implementation and translational – and that it is encouraging agencies to collaborate and learn from one another.

Again, we appreciate the opportunity to comment on the proposed HHS Strategic Plan for FY2018-2022. Thank you for your time and consideration of our comments.

Sincerely,

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