

OHA Rules Advisory Committee
C/O Ms. Haverkate, OHA Rules Officer
Human Services Building
500 Summer St NE, Room 457
Salem, OR 97301
December 18, 2018

Re: Notice of Proposed Rule Making, Chapter 409

Ms. Haverkate:

Thank you for the opportunity to provide comment on proposed rules for the Health Care Provider Incentive Programs.

The Oregon Dental Association represents about 2,200 providers in the state who are committed to improving the oral health of all Oregonians. We know that all oral disease is preventable, but all too often, Oregonians do not have proper access to providers. We understand firsthand the importance of having provider incentive programs designed to increase that access to essential health services in underserved areas of the state. While we know that these programs are not the entire solution to the issue of access, we view the programs as an important tool to begin to connect Oregonians with providers.

The Oregon Dental Association is a strong advocate for the loan repayment and forgiveness programs defined within these rules and we appreciate the committee's attention to the important details of program implementation. We encourage robust funding of these two programs. We fully support the committee's work, and look forward to our members' continued participation in the programs.

While we recognize that programmatic changes are unlikely to occur at this stage during the rule making process, we ask the committee and the Oregon Health Policy Board to consider future changes to the Medical Malpractice Insurance Premium Subsidies program to include dentists within the eligibility criteria. We look forward to working through this possibility with staff, committee and Board members.

We also encourage the committee, OHA staff and the OHPB to ensure that the newly created "Biennial Needs Assessment" includes a wholistic view on the workforce needed to meet Oregonians' health needs: ensuring that oral health is prioritized as much as physical and behavioral health needs.

Again, we send our deep appreciation to staff and committee members for the work on these rules.

Sincerely,



Daniel Miller, DMD

Chair, Oregon Dental Association Regulatory Affairs Committee