

June 27, 2014

Mr Ken Levine
Director
Texas Sunset Commission
PO Box 13066
Austin, Texas 78711

Re: Department of State Health Services Review

Dear Mr Levine:

The Texas Dental Association (TDA), a professional association representing more than 9,000 Texas dentists, welcomes the opportunity to provide written feedback regarding the sunset review process for the Texas Department of State Health Services (DSHS).

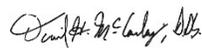
The Association of State Territorial Dental Directors (ASTDD) — a national non-profit organization representing public agency programs for oral health — developed “Best Practices Approaches for State and Community Oral Health Programs” to provide guidance to health agency officials and public health administrators in the development and operation of oral health programs at the state level. According to ASTDD, professional expertise and capacity within the state or territorial health agency is important to effectively address identified oral health needs.

Only the dentist has the comprehensive education required to diagnose, prevent, and treat diseases, disorders and conditions of the soft and hard tissues of the jaw, the oral cavity, maxillofacial area and the adjacent and associated structures. In basic terms, dentists are doctors who specialize in oral health. However, there is currently *no formal requirement* that a dentist serve as program manager for DSHS Oral Health Program (OHP). Therefore, the TDA respectfully requests that the position be designated in statute as requiring the leadership of a Texas-licensed dentist.

Mandating that only a Texas-licensed dentist serve as the dental director for the program ensures that DSHS’ OHP is led by the only member of the dental team with the training and expertise necessary to improve the state’s oral health. Program leadership by a dentist is integral to best effectively using the state’s resources to integrate oral health into overall health, to develop and implement oral health programming across all lifespans, to reduce oral health disparities, and to identify and successfully leverage outside resources to achieve the state’s oral health goals.

In conclusion, the TDA remains dedicated through both advocacy and direct patient services to improving access to oral health services for all Texans. Thank you for considering the TDA’s views on this important issue.

Sincerely,



David H. McCarley, DDS
President

cc: Dr David Lakey, Commissioner, Department of State Health Services
Senator Jane Nelson, Chair, Texas Sunset Commission
Representative Four Price, Vice-Chair, Texas Sunset Commission