



October 7, 2014

Wayne Stuberg, PT (Chair)  
Members, 407 Technical Review Committee

Clarification of Meeting One – 407 Technical Review Committee,

As requested, we have attached revised charts showing the differences of the NDA/NDAA Proposal and the NDHA Proposal. The differences are shown in bullet points. Some items are duties that are not new, but the supervision level is changed.

We also noted inaccuracies in the NDHA Proposal. Page 15, Item 10 states that there are 103 hygienists holding a Public Health Permit. I have included a recent Board of Dentistry newsletter that states there are only 77 currently active Public Health Permits. Also included is a Nebraska map showing dental shortage areas and where those permit holders are located within the state. As you can see, a very small percentage of Public Health Permits are located in "shortage areas."

Shortage areas does not mean that there insufficient dentists in the county. Custer County has four dentists resulting in a population/dentist ratio of 2,685/1, yet DHHS classifies it as a short area. The enclosed map shows all dentist offices in the state with a 25 mile radius circle (recognized by CMS as a reasonable distance to travel to the dentist). With the exception of the Sandhills, the state has sufficient dental office coverage.

Another inaccuracy in the NDHA Proposal occurs at the bottom of page 24 stating that there is a shortage of dentists. We have included a chart of dentists in private practice since 1993. As the chart indicates, the supply of dentists has been steadily increasing and the ratio of population to dentists has remained the same.

Sincerely,

David O'Doherty  
Executive Director  
Nebraska Dental Association