NRHA would love some feedback on ways other national and state partners are developing advocacy and information dissemination tools. How did other organizations address the recently proposed CY 2023 Medicare Physician Fee Schedule (PFS)? In what ways are other organizations advocating to state and federal lawmakers?

There really is only one way to go about submitting comments to proposed rule changes, but are other organizations without lawyers or policy divisions finding ways to make comments on rules like the PFS?

Case Overview: Access to oral health care in rural areas is lacking, primarily due to workforce shortages and lack of dental coverage. About 67% of all dental health professional shortage areas are rural, affecting more than 31 million people. Workforce shortages in rural areas mean that residents must travel further for dental services, disincentivizing them from seeking care. Additionally, gaps in dental coverage force rural residents to forgo care. Adults living in rural areas are more likely to be covered by Medicaid, which does not include extensive dental benefits in all states. Additionally, Medicare does not cover dental services, including neither preventative care nor screenings, which impacts older adults.

Ask of the Group:
- NRHA would love some feedback on ways other national and state partners are developing advocacy and information dissemination tools.
- How did other organizations address the recently proposed CY 2023 Medicare Physician Fee Schedule (PFS)? In what ways are other organizations advocating to state and federal lawmakers?
- There really is only one way to go about submitting comments to proposed rule changes, but are other organizations without lawyers or policy divisions finding ways to make comments on rules like the PFS?

Current Plan of Action:
- Advocacy and engagement for rural dental care should focus on increasing access to care.
- Advocates should talk with policymakers about:
  - Long-term recruitment and retention solutions for dental professionals
  - Full coverage for dental care under Medicare Part B
  - Modernizing rural health clinics to include preventative oral health care
  - Expanding Medicaid coverage in states that have not done so
- Additionally, the Centers for Medicare and Medicaid Services (CMS) and other federal agencies should offer opportunities for the public to participate in policy making.
**Recommendations**

- Increase advocacy activities and encourage advocates to talk with policymakers. Look for long-term solutions from grassroots and dental professionals.

- Engage on Capitol Hill: rules and regulations can only be acted upon when there is a legal basis from Congress. Get in touch with state and federal policymakers who can drive expansion of Medicaid/Medicare dental coverage and continue to reintroduce these bills.

- Comment on proposed rules or send letters to various officials in the administration, sharing provider, patient, and/or community experiences. It is important that policymakers hear the voices and experiences of people on the ground.

- Rely on subject-matter experts in the oral health field for research and data on oral health care access delivery in rural communities to make a case for advocacy.
  - Identify and disseminate best practices, which can build the case for research funding. With that, more data will become available that can be used to advocate for better policy.
  - Involve rural communities to be the voice and face of the advocacy movement.

- Partner with local organizations that are already collecting data. Although their sample sizes are small, over time, this type of relationship-building coupled with authentic partnerships will create shared power and transparency, which are helpful for advocacy.

- NRHA’s National Rural Oral Health Taskforce can use and elevate data to engage with subject-matter experts, local practitioners, and federal policymakers.

- CareQuest Institute for Oral Health works with dental providers, medical providers, and patients to collect on-the-ground, clinical data that can be used for advocacy purposes at both the state and national levels.

- In Pennsylvania, dental hygienists advocate for various policies through the PA Dental Hygiene Association (PDHA) Governmental Relations committee and through the PA Coalition for Oral Health. PDHA also has a lobbyist who advocates for hygienists.

- **Suggested resources:**
  - NRHA’s comment letter on the Centers for Medicare and Medicaid Services (CMS) proposed rule for the Physician Fee Schedule proposed rule for (CY) 2023
  - NRHA OPPS Comment Member Template
  - Virginia Health Catalyst Advocacy Postcards