



March 12, 2007

Tzvi Hefter
Director, Acute Care Division
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Dear Mr. Hefter:

On behalf of the American Dental Education Association (ADEA), I am requesting that the Centers for Medicare and Medicaid Services (CMS) issue a notice to fiscal intermediaries alerting them to the fact that there are now three additional post-graduate dental residency programs accredited by the Commission on Dental Accreditation (CODA), but not listed in any Federal Register notice, or to my knowledge, otherwise noted by CMS. The three programs, their dates of accreditation by CODA, and their initial residency period are:

Oral and maxillofacial radiology	1996	2 years (minimum)
Dental anesthesiology	1/25/2007	2 years (minimum)
Oral medicine	2006	2 years (minimum)

The letters from CODA granting approval of these programs are attached. If you need to verify this information, I would suggest that you contact Peggy Soldener, Manager, Postdoctoral General Dentistry Education, Commission on Dental Accreditation, at 312/440-2788.

I believe the last formal listing of all accredited residency programs appeared in the *Federal Register* on August 30, 1996, 61 *Fed. Reg.* 170 at page 46211. We do not believe it is necessary for CMS to publish an updated listing of approved residency programs in order for hospitals to count residents in these programs for graduate medical education (GME) funding. Nevertheless, some formal acknowledgement by CMS would be helpful to the hospitals in discussions with fiscal intermediaries.

It is possible that a reply from you to this letter acknowledging that residents in these programs are eligible to be counted for GME purposes would be sufficient support for the fiscal intermediaries. In the alternative, this information could be included in a program memorandum or even possibly in the inpatient rulemaking that is schedule to be issued shortly. Some type of formal acknowledgement on this issue would be extremely helpful to the programs.

Please feel free to contact Jack Bresch, Associate Executive Director and Director of the ADEA Center for Public Policy and Advocacy at 202/289-7201 or breschj@adea.org if you have any further questions. Thank you in advance for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink that reads 'Richard W. Valachovic' followed by a small monogram.

Richard W. Valachovic, D.M.D., M.P.H.
Executive Director

Attachment: CODA letters