

September 22, 2020

ADM Brett P. Giroir, M.D.
Assistant Secretary for Health
U.S. Department of Health and Human Services
200 Independence Avenue SW
Room 715-G
Washington, D.C. 20201

Re: Expanding Authorization for Dental Professionals to Order and Administer COVID-19 Vaccinations

Dear Admiral Giroir:

The 28 undersigned organizations from a COVID-19 Dental Coordination Group applaud your proactive efforts to improve access to safe and effective COVID-19 vaccines, once available, by utilizing the Public Readiness and Emergency Preparedness Act (PREP Act) to expand authorization for pharmacists to order and administer vaccines. We further urge you, under the PREP Act, to expand authorization for dental professionals to order and administer these vaccines. While our organizations appreciate the steps taken by the U.S. Department of Health and Human Services (HHS) to ensure vaccines can be delivered widely, safely, and effectively by 2021, including the more than 340,000 U.S. dental professionals¹ in the list of eligible providers permitted to administer the COVID-19 vaccine enhances the nation's ability to respond effectively to the present crisis.

Dental professionals are critical primary health care providers who serve on our nation's frontlines. These highly trained medical professionals have both the experience and expertise to help with our national pandemic response efforts. Licensed dental professionals, such as dentists (D.D.S./D.M.D.) and hygienists (R.D.H.), and dental therapists, appropriately working in a number of states, are trained in human anatomy, physiology, and pathophysiology as well as in administering intra-oral local anesthesia. It is arguably technically more difficult to administer an inferior alveolar nerve block inside the oral cavity than to administer a subcutaneous or intramuscular vaccine to an exposed arm. Some states are already beginning to expand the scope of practice for dental professionals. Last year, Oregon passed a law allowing dentists to prescribe and administer vaccinations, joining Minnesota and Illinois, where dentists—under a more limited scope—can administer the seasonal influenza vaccine to adults. Furthermore, according to the American Association of Dental Boards, at least half of U.S. states are already considering using oral health professionals in the administration of the COVID-19 vaccine when it becomes available.²

Expanding the scope of practice, particularly during times of health crisis, is not unprecedented. During the [2009 H1N1 Influenza Pandemic](#), several states expanded the provider scope of practice to allow oral health professionals to administer the H1N1 vaccine. Dentists administering H1N1 vaccinations had to follow certain state policies, including completing state-defined trainings and reporting data to the state immunization registry. Certainly, the COVID-19 pandemic justifies continuing this precedent.

Dental professionals also serve as an important bridge to filling gaps in health care to prevent the spread of disease, and notably, are trusted by the American people. According to a recent poll, dentists rank in

¹ Oral Health Workforce Projections, Health Resources and Services Administration. April 2020. <https://bhw.hrsa.gov/health-workforce-analysis/research/projections/oral-health-workforce-projections>

² USPHS Chief Dental Officer Newsletter #51: August 18, 2020. https://www.henryschein.com/us-en/images/dental/USPHS-Chief-Dental-Officer-Newsletter-Issue-51-August-18_2020.pdf

the top five professions among U.S. participants for honesty and ethical standards.³ In 2017, nearly 85 percent of children aged 2-17 and 64 percent of adults aged 18-64 reported a dental visit during the past year.⁴ Moreover, according to information from the Agency for Healthcare Research and Quality, it is estimated that in a given year 31.1 million Americans visit a dentist but do not see a physician.⁵ These statistics reveal a significant public health opportunity for dental offices and dental clinics, particularly in the context of the COVID-19 crisis. As we consider ways to administer the COVID-19 vaccine to as many individuals as possible, we cannot afford to overlook these vital care providers.

Particularly during these unprecedented times, we should make every effort to reduce barriers associated with immunization disparities in this country. As we know from the seasonal influenza vaccination, immunization rates for adults in the United States are insufficient.⁶ With factors including lack of access and insurance, public distrust in science, and concerns about vaccine side-effects and safety affecting vaccination rates, we must do everything we can to ensure those wishing to get a COVID-19 vaccine can do so once they are available. Utilizing dental professionals can increase accessibility to the vaccine, particularly in rural areas where people may not have access to clinics or drug stores.

As you and your colleagues work to finalize a national COVID-19 vaccination strategy, the undersigned organizations implore you to expand the scope of practice for dental professionals to administer vaccines in order to aid in outbreak prevention and control. We stand ready to assist with the logistics and practical implementation questions of the expanded scope of practice, including but not limited to, insurance code and reimbursement questions; vaccine acquisition, preservation, and disposal; and immunization reporting requirements.

Thank you for considering our request and for your continued leadership in response to the COVID-19 crisis. If you have any questions, please contact Christopher Fox at the American Association for Dental Research at 703.299.8082 or cfox@aadr.org.

Sincerely,

Academy of General Dentistry
American Association for Dental Research
American Association for Women Dentists
American Association of Public Health Dentistry
American Board of Dental Public Health
American Dental Assistants Association
American Dental Association
American Dental Education Association
American Dental Hygienists' Association
American Public Health Association Oral Health
Section
Association of Dental Support Organizations
Association of State and Territorial Dental Directors
Dental Trade Alliance
DentaQuest Partnership

Dentsply Sirona, Inc.
Henry Schein, Inc.
Hispanic Dental Association
Medicaid|Medicare|CHIP Services Dental Association
National Coalition of Dentists for Health Equity
National Dental Association
National Dental Hygienists' Association
National Network for Oral Health Access
OSAP (Organization for Safety, Asepsis and Prevention)
Risas Dental & Braces
Santa Fe Group
Society of American Indian Dentists
The American Institute of Dental Public Health
The Forsyth Institute

³ Nurses Continue to Rate Highest in Honesty, Ethics. Gallup. January 6, 2020. <https://www.advisory.com/daily-briefing/2020/01/10/nurse-trusted>

⁴ Health, United States, 2018, table 37. CDC/National Center for Health Statistics. <https://www.cdc.gov/nchs/data/hsu/2018/037.pdf>

⁵ "Population (millions) with DV and/or MD Visits, 2000-2017" table. Agency for Healthcare Research and Quality. Unpublished.

⁶ *Flu Vaccination Coverage, United States, 2018–19 Influenza Season*. CDC, 2019; Available from: <https://www.cdc.gov/flu/fluview/coverage-1819estimates.htm>