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March 12, 2021

Jack Herrmann, MEd, NCC, LMHC
Office of the Assistant Secretary for Preparedness and Response
U.S. Department of Health & Human Services
Sent electronically to John.Herrmann@hhs.gov

Dear Mr. Herrmann,

On behalf of the American Dental Hygienists' Association (ADHA), we are pleased that priority has been given to increase the eligible healthcare professionals who can administer COVID-19 vaccines. We are however, concerned about the yet unpublished amendment #7 to the Public Readiness and Emergency Preparedness Act for Medical Countermeasures Against COVID-19 (PREP Act). Specially, the omission of the nation's more than 226,000 dental hygienists. One way in which the nation's dental hygienists could be of assistance is in administering COVID-19 vaccinations. Tapping into this available cadre of licensed health care providers would augment the vaccinator workforce and accelerate the pace of vaccinations.

Dental hygienists standby ready to be a part of the COVID-19 solution and administer COVID-19 vaccines. We ask that amendment #7 be reconsidered and amended to include dental hygienists prior to the March 16, 2021 publishing date.

Dental hygienists are educated and licensed health care providers who could assist their communities in flattening the curve by administering COVID-19 vaccines during the pandemic. Dental hygiene biomedical science education content includes content in anatomy, physiology, immunology, pharmacology infection control and medical emergencies.

We understand that the dental hygienists serving in the U.S. Public Health Services have been authorized to administer the COVID-19 vaccines. We encourage you to include their civilian counterparts in these efforts, as well.

Thank you for your consideration of ADHA's views, and for your work to expand administration of COVID-19 vaccines. We would be pleased to provide additional information or answer questions. Do not hesitate to contact ADHA Director of Advocacy and Education Ann Lynch at 312.440.8942 or annl@adha.net.

Sincerely,

A handwritten signature in black ink that reads 'Ann Battrell'.

Ann Battrell, MSDH, Chief Executive Officer

Cc: Timothy L. Ricks, DMD, MPH, FICD, Rear Admiral, Assistant Surgeon General,
and Chief Dental Officer, US Public Health Service
Lisa Moravec, RDH, MS, ADHA President
Sharlee Burch, RDH, MPH, EdD, ADHA President-Elect
Ann Lynch, ADHA Director of Advocacy & Education
Karen Sealander, ADHA Washington Counsel and Partner, McDermott Will & Emery