

Pandemic Response Workgroup COVID-19 Collective Action Sign-on Letter

COVID-19 Response Can Benefit from Contributions by Dental Professionals: Action Needed

The COVID-19 pandemic's impact on our nation has been staggering. COVID-19 deaths are approaching 500,000. Millions of people are out of work and struggling to keep themselves housed and fed. Lives have been disrupted and many schools are closed. Hospitals are at capacity and struggle to care for COVID-infected patients. This devastation has exposed and worsened long-standing health and social inequities across our country. For example, Blacks have been dying from COVID-19 at a rate double their share of the total U.S. population,ⁱ and early data is showing similar disparities in the distribution of the vaccine.ⁱⁱ Black and Latino families are also much more likely to be experiencing food and housing insecurity.ⁱⁱⁱ

The country is being called upon to mobilize all available resources to address the pandemic and its impacts. Yet the dental workforce – more than 200,000 licensed dentists and more than 220,000 licensed dental hygienists – has been significantly underused in the response to this national emergency. This workforce is distributed across the country, in urban and rural areas, in every community. And every year almost 30 million Americans visit a dentist but not a physician.^{iv} Dental professionals are eager to be fully engaged in the national effort to end this pandemic and it is smart policy to give them that opportunity.

Oral health providers can administer COVID-19 tests and vaccines, and can also serve as trusted sources of accurate information to promote equitable distribution of the vaccine, but barriers remain. Dental professionals have the necessary education and experience, yet their full engagement has been stymied by policy and practice. State scope of practice rules and common liability restrictions are preventing dental professionals in many states from administering COVID-19 tests and vaccines.

Ready solutions are available at both the federal and state levels.

- **At the federal level,** President Biden's *National Strategy for the COVID-19 Response and Pandemic Preparedness* recognizes the need to leverage federal authorities to expand the vaccinator workforce. Consistent with this directive, **we ask the Administration to take executive action to provide dental professionals with immunity from liability for administering the COVID-19 vaccine during the public health emergency.** This can be accomplished either by amending the PREP Act^v declaration^{vi} to explicitly include dentists and dental hygienists as "qualified persons," or by HHS guidance extending PREP Act protections to dental professionals, as was recently done for pharmacists and pharmacy technicians.^{vii}
- **At the state level, we ask governors to exercise their public health emergency authority to issue directives allowing dentists and dental hygienists to administer COVID-19 tests and vaccines.** Currently, 26 states and territories allow dentists to administer COVID-19 tests, and 22 states allow them to administer the vaccine. Only 10 states allow dental hygienists to give the vaccine. Governors in the remaining states must act now to include the dental workforce as vaccinators, as well as ensure that dental professionals are able to be vaccinated themselves so they may safely vaccinate others.

We urge federal and state policy makers to include this country's 420,000 dental professionals fully in the all-hands-on-deck COVID-19 response efforts. It is time to recognize them as the resource they are, eliminate liability hurdles, give them access to the vaccine themselves, and include them in the local information flow about testing and vaccines. They can be especially impactful in hard-to-reach areas and with people at the highest risk of experiencing the devastating impacts of this disease. Together, we can save lives and set the stage for repairing the economy. There is not a moment to waste.

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[Add organization sign-ons]

The Oral Health Pandemic Response Workgroup

The Oral Health Pandemic Response Workgroup is an ad hoc gathering of executives across the dental landscape. We represent providers (dentists, dental hygienists and dental assistants), dental plans, dental service organizations, dental practices, payers, dental supply manufacturers, state dental boards, community clinics, the public health community, government, academia, philanthropy, advocates, and members of the community (including racial and ethnic minority groups, people with disabilities, and rural Americans).

ⁱ CDC, *COVID-19 Racial and Ethnic Health Disparities*, updated December 10, 2020, available here: <https://www.cdc.gov/coronavirus/2019-ncov/community/health-equity/racial-ethnic-disparities/disparities-deaths.html>

ⁱⁱ See *Latest Data on COVID-19 Vaccinations Race/Ethnicity*, Kaiser Family Foundation, February 2, 2021, available here: <https://www.kff.org/coronavirus-covid-19/issue-brief/latest-data-covid-19-vaccinations-cases-deaths-race-ethnicity/>

ⁱⁱⁱ See *Tracking the COVID-19's Recession's Effect on Food, Housing, and Employment Hardships*, Center on Budget and Policy Priorities, posted January 28, 2021, available here: <https://www.cbpp.org/research/poverty-and-inequality/tracking-the-covid-19-recessions-effects-on-food-housing-and>

^{iv} Vujcic, M., *Health care reform brings new opportunities*. *Journal of the American Dental Association*, Volume 145, Issue 4, April 1, 2014; available at [https://jada.ada.org/article/S0002-8177\(14\)60019-2/fulltext](https://jada.ada.org/article/S0002-8177(14)60019-2/fulltext)

^v COVID-19 Public Readiness and Emergency Preparedness Act

^{vi} Information about the current PREP Act declaration and its amendments is available here:

<https://www.phe.gov/Preparedness/legal/prepact/Pages/default.aspx>

^{vii} The October 29, 2020, HHS guidance regarding pharmacies and pharmacists is available here:

<https://www.hhs.gov/guidance/sites/default/files/hhs-guidance-documents//prep-act-authorization-pharmacies-administering-covered-countermeasures.pdf>