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### **Action Needed: COVID-19 Response Can Benefit from Contributions by Oral Health Professionals**

Ms. Cochran, Dr. Walensky, and Dr. Collins:

**The COVID-19 pandemic's impact on our nation has been staggering.** COVID-19 deaths have exceeded 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 long-standing health and social inequities across our country, including among Hispanic, Black, Indigenous and other People of Color, residents of rural areas, and people with disabilities. These groups are disproportionately likely to face challenges in getting a COVID-19 vaccine.

**The country is being called upon to mobilize all available resources to address the pandemic and its impacts.** Yet the oral health 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 every community: every year almost 30 million Americans visit a dentist but not a physician. These clinicians 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.** They 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 oral health 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 oral health professionals with immunity from liability for administering the COVID-19 vaccine during the public health emergency while protecting consumers through a federal fund.** This can be accomplished either by amending the Public Readiness and Emergency Preparedness (PREP) Act declaration to explicitly include dentists and dental hygienists as "qualified persons," or by HHS guidance extending PREP Act protections to oral health professionals, as was recently done for pharmacists and pharmacy technicians.
- **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 25 states allow

them to administer the vaccine. Only 14 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 oral health 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 oral health 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.

Respectfully,

American Association of Dental Boards  
American Dental Association  
American Dental Hygienists Association  
Arcora Foundation  
Asian Resources, Inc.  
Association of State and Territorial Dental Directors  
California Pan-Ethnic Health Network  
Community Catalyst  
Dental Trade Alliance  
DentaQuest  
DentaQuest Partnership for Oral Health Advancement  
Hispanic Dental Association  
National Dental Association  
National Rural Health Association  
Oral Health Progress and Equity Network  
Project Accessible Oral Health  
Santa Fe Group

**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).

Cc:

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Elizabeth Richter, Acting Administrator for the Centers for Medicare & Medicaid Services  
Luis Padilla, MD, FAAFP, Associate Administrator for the Bureau of Health Workforce  
Dawn O'Connell, Senior Counselor to the Secretary for COVID Response  
Alex Huttinger, COVID Health Equity Taskforce