

April 11, 2020

Rear Admiral Timothy L. Ricks, DMD, MPH  
United States Public Health Service  
5600 Fishers Lane  
Rockville, MD 20857

Dear Admiral Ricks,

The ability to determine a patient's COVID-19 infected or immune status with point-of-care (POC) FDA-approved or cleared serological and molecular tests, represents an opportunity to resume delivery of oral health care in the United States. Since late March 2020, dental offices have treated only acute oral emergencies. Presently, these patients are evaluated, and in many cases treated, without the practitioner's ability to test for COVID-19. Science and data suggest that, as a respiratory virus, transmission and spread of COVID-19 is mainly through aerosol particles. The unavoidable production of aerosols during dental treatment is reason enough to immediately include dental offices among the healthcare workers who can purchase and administer these tests.

The blueprint for resumption of business and phase-in of treatment in dental offices when the U.S. ultimately returns to work has yet to be drafted. At this juncture, offices need to plan for any necessary alterations in protocol changes. Considering the potential hazards associated with aerosol production in the dental setting, pre-testing patients of record is a viable and prudent solution to diminish the threat of continued transmission.

The goal of POC testing in the dental setting is threefold:

1. Uninfected and/or immune patients can receive treatment with appropriate precautions, infection control protocols and personal protective equipment (PPE);
2. Asymptomatic infected individuals will be identified and immediately referred to their primary care practitioner for appropriate treatment and quarantine (adhering to prevailing CDC Guidelines);
3. Any aerosols created during treatment of uninfected and /or immune patients will carry minimal risk to patients, staff and dentist, require standard infection control protocols and PPE, thereby decreasing the possibility of another outbreak.

Authorizing dentists to order and administer FDA-approved or cleared POC COVID-19 tests will allow patients to pursue and resume oral care, significantly decrease the risk



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of transmission in dental offices, identify asymptomatic infected patients who, if not for their planned dental visit may continue transmitting the virus.

The Academy of General Dentistry (AGD) urges the office of the Assistant Secretary for Health to issue guidance under the Public Readiness and Emergency Preparedness Act authorizing licensed dentists to order and administer FDA-approved or cleared point-of-care COVID-19 tests. This important step will expand testing and reporting, allow resumption of dental care for noninfectious patients, identify and begin CDC treatment protocols for infected individuals and allow the dental care industry to immediately begin planning a strategic, science-based approach to patient care delivery in the days to come.

Sincerely,

A handwritten signature in black ink that reads 'Connie L. White, DDS, FAGD'. The signature is written in a cursive style.

Connie L. White, DDS, FAGD