



NEVADA STATE SOCIETY OF ORAL
and
MAXILLOFACIAL SURGEONS



September 30, 2020

The Nevada Board of Dental Examiners
6010 S Rainbow Blvd #1
Las Vegas, NV 89118

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

Dear the Nevada State Board of Dental Examiners:

The Nevada Academy of General Dentistry applauds your proactive efforts to review regulatory changes that would permit licensed dentists the option to administer vaccinations.

As you know, dental professionals are critical primary health care professionals who serve on Nevada's frontlines. These highly trained medical professionals have both the experience and expertise to help with the pandemic response efforts. Licensed dental professionals, such as dentists (D.D.S./D.M.D.) and hygienists (R.D.H.), 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.¹

During these unprecedented times, we support the Board in making every effort to reduce barriers associated with immunization disparity in our state. 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.

¹ 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



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As you and your colleagues work to review the dental health professional's participation in the COVID-19 vaccination strategy, we implore you to expand the scope of practice for dental professionals to administer vaccines in order to aid in outbreak prevention and control.

Thank you for considering our request and for your continued leadership in response to the COVID-19 crisis.

Sincerely,

A handwritten signature in cursive script that reads "Emily Ishkanian Neal".

Emily Ishkanian Neal DMD
Nevada Academy of General Dentistry, President

A handwritten signature in cursive script that reads "Steven Saxe".

Steven Saxe DMD
Nevada State Society of Oral and Maxillofacial Surgeons

A handwritten signature in cursive script that reads "Sulabh Shroff".

Sulabh Shroff, DMD
Nevada Academy of Pediatric Dentistry, President