

September 2, 2020

The Honorable Brian Babin
U.S. House of Representatives
2236 Rayburn House Office Building
Washington, D.C. 20515

Dear Representative Babin,

On behalf of the Academy of General Dentistry (AGD) and its 39,000 members, I would like to thank you for all of the efforts you have undertaken in response to the 2019 novel coronavirus (COVID-19).

As a dentist, you know firsthand the great lengths dental health care providers go to in implementing infection prevention and control measures that provide the safest experience possible for our patients, our staff, and ourselves. With most dental practices now open in some capacity to provide oral health care, the need for clear, consistent, and reasonable guidelines for dental facilities during this pandemic is essential.

The Centers for Disease Control & Prevention's (CDC) most recent iteration of the "Interim Infection Prevention and Control Guidance for Dental Settings During the Coronavirus Disease 2019 (COVID-19) Pandemic"¹ includes changes that the AGD and its members consider difficult to attain and at odds with existing Occupational Safety and Health Administration (OSHA) guidelines.

Regarding the use of N95 masks, the current to CDC Guidelines substituted prior wording of "consider the use of N95..." and strengthened it to "should use an N95..." during aerosol-generating procedures. AGD members, and the dental community at large, continue to experience PPE vendor supply shortages with the inability to procure N95 masks.

Prior CDC Guidelines (May 19, 2020) allowed for flexibility when N95s are not available. A face-shield plus the highest-level mask available was considered an acceptable alternative. During the last three months, over 170,000 U.S. dentists have delivered treatment using those guidelines without incident. Until the supply limitation of N95 masks is resolved and sound, scientific research establishes N95 masks as the minimum level of protection, the AGD believes that the CDC should return to its less compulsory language in its guidance.

¹ Interim Infection Prevention and Control Guidance for Dental Settings During the Coronavirus Disease 2019 (COVID-19) Pandemic, Centers for Disease Control and Prevention, August 2020, (<https://www.cdc.gov/coronavirus/2019-ncov/hcp/dental-settings.html>)



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In a survey of dentists conducted by the American Dental Association's Health Policy Institute (HPI) for the week of August 24, only 57.1% of dentists said they had more than a 14 day supply of N95/KN95 masks². In that same survey, 47.5% of dentists said obtaining PPE/other supplies was one issue that was currently most challenging to them during the COVID-19 pandemic³.

Given these present challenges, the AGD respectfully requests that you weigh in with the CDC and urge them to amend current guidance language and return to the previously effective and attainable N95 recommendations posted on May 19, 2020. Additionally, enclosed is a copy of an August 26 request on the subject submitted by AGD to the CDC's Acting Director for the Division of Oral Health, Casey Hannan, for reference.

We look forward to continuing to work with you during this critical time to protect the health of our nation. If you or your staff have any questions, please contact Daniel J. Buksa, JD, Associate Executive Director of Public Affairs, by phone at (312) 440-4328 or via email at daniel.buksa@agd.org to let us know how we may be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads 'Connie L. White, D.D.S., FAGD'.

Connie White, D.D.S., FAGD
President
Academy of General Dentistry

Enclosure:

² COVID-19 Economic Impact on Dental Practices Week of August 24 Results, ADA Health Policy Institute, August 2020, Pg.25

(<https://iad1.qualtrics.com/reports/RC/public/YWRhc3VydmV5cy01ZiQ1MmIzOGVhZTMzMjAwMTY4NDA0MzktVVJfNWJlWDFFU01ldmNDUjV0>)

³ COVID-19 Economic Impact on Dental Practices Week of August 24 Results, ADA Health Policy Institute, August 2020, Pg.74

(<https://iad1.qualtrics.com/reports/RC/public/YWRhc3VydmV5cy01ZiQ1MmIzOGVhZTMzMjAwMTY4NDA0MzktVVJfNWJlWDFFU01ldmNDUjV0>)

August 26, 2020

Casey Hannan, MPH
Acting Director, Division of Oral Health
Centers for Disease Control & Prevention (CDC)
1600 Clifton Rd.
Atlanta, GA 30329

Dear Mr. Hannan:

The Academy of General Dentistry (AGD) represents 39,000 general dentists who provide the full range of dental care to patients across the country. We thank you for including AGD representatives in ongoing discussions, deliberations, and development of guidelines for dental facilities as America continues to resume standard essential dental care.

AGD dentists are committed to the safest experience possible for our patients, our staff and ourselves. To that end, clear, practicable guidance as well as attainable regulations are not only invaluable to practitioners; they serve to decrease consumer confusion.

The CDC's most recent iteration of the "Interim Infection Prevention and Control Guidance for Dental Settings During the Coronavirus Disease 2019 (COVID-19) Pandemic," (August 4, 2020) includes changes that the AGD and its members consider difficult to attain and at odds with existing Occupational Safety and Health Administration (OSHA) guidelines.

Regarding the use of N95 masks, the most recent update to CDC Guidelines substituted prior wording of "*consider* the use of N95..." and strengthened it to "*should use* an N95..." during aerosol generating procedures. AGD members, and the dental community at large, continue to experience PPE vendor supply shortages with the inability to procure N95 masks. NPR provided coverage of this national problem as recently as August 19th.¹

Prior CDC Guidelines (May 19, 2020) allowed for flexibility when N95s are not available. A face-shield plus the highest-level mask available was considered an acceptable alternative. During the last three months, over 170,000 U.S. dentists have delivered treatment using those guidelines without incident. Until the supply limitation of N95 masks is resolved but more importantly, sound, scientific research establishes N95 masks as the minimum level of protection, the AGD respectfully asks that the CDC return to its less compulsory language in its guidance.

In a June 1st conversation between AGD and OSHA officials, PPE guidelines were described by OSHA as "adaptable." The AGD believes the inclusion of that term in subsequent federal guidance documents is an important distinction and helpful to AGD members as the pandemic

¹ <https://www.npr.org/2020/08/19/903612006/yep-masks-and-protective-gear-are-still-hard-get-especially-for-small-buyers>

continues. The Academy urges amended guidance to allow for alternative personal protective equipment (PPE) combinations based upon the clinical judgment of the professional licensee in their jurisdiction of practice.² The intention of general dentists is to use the highest level of PPE as necessary for personal, staff, and patient protection.

As mentioned, consumers and regulatory agencies look to the CDC guidance to stay informed and establish standards. Creating an expectation that dental professionals *should use* N95 masks during treatment, when acquiring those masks is impossible, perpetuates confusion and diminishes patient confidence in the dental-care delivery system. All patients require regular dental care. Especially in the time of COVID-19, uncertainty and/or lack of confidence is an easy disruptor of that care.

Over the last 35 years dentistry has led the charge in healthcare infection control. General dentists aim to maintain the professions stellar safety record and will continue to practice infection control with the highest PPE necessary and available. The AGD respectfully urges the CDC to amend its current language and return to the heretofore effective and attainable N95 recommendations posted on May 19, 2020.

Please feel free to reach me or Mr. Pat O'Connor, the Academy of General Dentistry, Washington Representative, can be reached at 703/351-6222 or patoconnor@kentoconnor.com.

Sincerely,



Connie L. White, DDS, FAGD

AGD President

whiteco@umkc.edu

² M. Emmanuel Bhaskar, MD, Santhanan Arun, MBBS, SARS-CoV-2 Infection Among Community Health Workers in India Before and After Use of Face Shields. *JAMA*. Published online August 17, 2020. doi:10.1001/jama.2020.15586