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April 15, 2020

Dear Governors and State Dental and Health Boards,

The Academy of General Dentistry (AGD) is engaged in developing guidance for its members in preparation of reopening dental practices to non-urgent care once executive order restrictions are lifted. We are committed to working with all stakeholders to plan a strategic, science-based approach to patient delivery in the days to come. Dentistry has a strong record of leading in infection control, as it did during the HIV/AIDS crisis.

Until there is a vaccine for COVID-19, dental practices will need to continue to focus on identifying non-contagious patients and non-urgent procedures for the safety of patients and staff. State legislators, federal agencies, and regulators will be important partners in assuring that any interim or final state regulations do not create unnecessary barriers and that regulatory agencies work in partnership with dental practices.

Authorizing licensed dentists to obtain and administer FDA-approved and emergency use authorization point-of-care COVID-19 tests is critical to allowing resumption of dental care for noninfectious patients. The AGD has asked the U.S. Department of Health and Human Services (DHHS) to issue guidance under the Public Readiness and Emergency Preparedness Act granting this, as it has for pharmacists. Challenges with CLIA requirements and scope of practice issues must be rectified to allow testing for pharmacists as well as dentists without undue administrative burdens.

The AGD is requesting that state dental boards proactively review their dental practice acts to determine whether administering diagnostic (molecular) and/or a serological COVID-19 tests are currently permissible within the scope of practice and, if necessary, to make changes to ensure that it is permissible. Working with CDC, NIOSH, NIH, FDA, and OSHA, AGD leadership will add valuable insight into best practices to ensure a safe environment for providers, staff, and patients. Once the DHHS issues guidance, the dental board will then be in a position to provide clear direction to licensees.

The AGD requests states consider broadening the scope of their prescription drug monitoring programs (PDMPs) database to include results of COVID-19 tests performed at pharmacies. If patients consented for results to be included in the database and accessed only by treating providers, it would be a mechanism for dentists to obtain the patient's status and would support point-of-care testing. Whatever the method or location of testing, health care providers must be able to obtain access to the database containing patient results in order to determine the infected and/or immune status at time of treatment. AGD awaits CDC guidance in the testing arena to best utilize scientific evidence in the safe treatment of patients.

Thank you very much for your consideration. As states work to effectively combat the COVID-19 pandemic, the AGD is ready to assist in any way we can. If you have questions or would like to discuss further, please contact AGD Government Relations Manager, Michael Toner at michael.toner@agd.org.

Sincerely,

A handwritten signature in black ink that reads 'Connie L. White, DDS, FAGD'.

Connie L. White, DDS, FAGD

AGD President