

June 4, 2020

William Matarazzo
Industrial Hygienist/National Alliance Coordinator
Occupational Safety & Health Administration (OSHA)
Office Of Outreach Services and Alliances
200 Constitution Ave., NW
Washington, D.C. 20210

Dear Mr. Matarazzo,

On behalf of our 39,000 members the Academy of General Dentistry (AGD) would like to thank you for the constructive conversation, which took place on June 1, 2020. The AGD represents general dentists who provide continuing comprehensive oral care to the public.

As stated in our discussion, the Academy seeks to provide clear, concise guidance to its members as dentistry moves beyond emergency-only care and resumes comprehensive treatment.

To that end, the AGD requests the creation of a single document synthesized from the following resources:

- OSHA guidance for *Dentistry Workers and Employers*¹
- The Updated Interim Enforcement Response Plan for Coronavirus Disease 2019 (COVID-19)²
- The Revised Enforcement Guidance for Recording Cases of Coronavirus Disease 2019 (COVID-19)³

SUGGESTED MODIFICATIONS:

To reduce confusion and provide alignment with other federal agencies, we request that OSHA recommendations for personal protective equipment (PPE) allow for professional judgment based upon local COVID-19 transmission rates and relative risks within the community. In its

¹ U.S. Department of Labor, Occupational Safety and Health Administration. Dentistry Workers and Employers Guidance for Dentistry Workers and Employers. [Guidance for Dentistry Workers and Employers](#).

² <https://www.osha.gov/memos/2020-05-19/updated-interim-enforcement-response-plan-coronavirus-disease-2019-covid-19>

³ <https://www.osha.gov/memos/2020-05-19/revised-enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19>

most recent guidance, the CDC notes, *“if your community is experiencing no transmission or minimal community transmission, dental care can be provided to patients without suspected or confirmed COVID-19 using strict adherence to Standard Precautions.”* Moreover, the Food and Drug Administration states *“it is important to recognize that the optimal way to prevent airborne transmission is to use a combination of interventions from across the hierarchy of controls, not just PPE alone.”*⁴ The AGD concurs with those assessments and requests that OSHA adopt language similar to the CDC, allowing reasonable latitude for judicious use of high level PPE which is in short supply nationally.

In the May 1, 2020 OSHA guidance, the heading of **“Well Patients,”** is prescriptive for *dental procedures that may or are known to generate aerosols* in determining that *“NIOSH-certified, disposable N95 filtering facepiece respirator or better.”*^{*} There are multiple types of aerosol generating procedures (AGPs) in dentistry, none of which have been evaluated with respect to viral load capability. Currently the CDC recommends dental personnel consider using N95 masks during AGPs or if an N95 mask is not available CDC recommends use of both a full-face shield and highest level of surgical mask available.

Further, the CDC acknowledges the present lack of data in this area.⁵ The AGD strongly recommends the guidance be amended to allow alternative PPE combinations based upon informed clinical judgment of the professional licensee.

Specifically, the AGD recommends that the May 1, 2020 OSHA guidance under the heading of **Well Patients** be revised to read:

- NIOSH-certified, disposable N95 filtering facepiece respirator ~~or better,~~ a use of a full-face shield with the highest level of surgical mask available, or an alternative PPE combination based on the informed clinical judgment of the professional licensee.

During our conversation on June 1, OSHA representatives described OSHA guidelines as “adaptable.” We believe the inclusion of that term in subsequent documents is an important distinction and helpful to our members as the pandemic evolves. The Academy asks that OSHA

⁴ U.S. Food and Drug Administration. N95 Respirators and Surgical Masks (Face Masks). Content current as of 04/05/2020; <https://www.fda.gov/medical-devices/personal-protective-equipment-infection-control/n95-respirators-and-surgical-masks-face-masks>

⁵ U.S. Centers for Disease Control & Prevention. Guidance for Dental Settings, Interim Infection Prevention and Control Guidance for Dental Settings During the COVID-19 Response. Updated on May 19, 2020. <https://www.cdc.gov/coronavirus/2019-ncov/hcp/dental-settings.html>



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recommendations remain in alignment with those of the CDC and urges amending current guidance to allow alternative PPE combinations based upon clinical judgment of the professional licensee in their jurisdiction of practice.

In addition to the aforementioned modification recommendations for the synthesized document, we respectfully suggest the inclusion of a “FAQ” section to proactively address commonly asked questions.

The COVID-19 pandemic has challenged every aspect of health care to employ prudent measures that minimize risk of disease transmission. As the world waits for science to provide answers, we as practitioners do our very best with the information at hand. Official guidance should be reasonable, attainable and comprehensible for health care practitioners. It should also recognize that all health care personnel, now and in the foreseeable future, assume some risk in ministering to the patients who have entrusted their care with us.

The AGD thanks you for consideration of our requests. We look forward to continued discussions in pursuit of our common goals of a safe workplace as well as a safe dental visit. Please feel free to reach me or Mr. Pat O’Connor, the Academy of General Dentistry Chief Lobbyist, can be reached at 703/351-6222 or patoconnor@kentoconnor.com.

Sincerely,

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

Connie L. White, DDS, FAGD

AGD President

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