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August 13, 2020

Ms. Michelle Lee  
Executive Director  
Organization for Safety Asepsis and Prevention (OSAP)  
3525 Piedmont Rd, NE  
Building 5, Suite 300  
Atlanta, GA 30305

Dear Ms. Lee:

On behalf of our 39,000 general dentist members, we thank you for including the Academy of General Dentistry (AGD) in the OSAP CDC Listening Session #1 on July 24<sup>th</sup>, 2020. A full seventy-nine percent of individuals practicing dentistry are **general dentists**.<sup>1</sup> Any proposed regulatory and/or legislative activity impacting the practice of dentistry must naturally include input from the majority representative experts of the field. We appreciate OSAP's acknowledgement of this, as well as the invitation to provide commentary.

The following points were extracted from the July 24<sup>th</sup> Session by our AGD participants:

- The science surrounding Covid-19 is incomplete and continues to evolve. Recommending additional layers of infection control without evidence of need is imprudent.
- Unlike federal regulations, "CDC Guidance" is not required by mandate. Nonetheless, this "guidance" is often interpreted by state dental boards as persuasive authority in legal interpretation. Accordingly, all future guidance should be measured and cautious, to avoid institution of rules and requirements that lack scientific vetting.
- Guidance must also recognize that all health care personnel, now and in the foreseeable future, assume some risk in attending to patients who have entrusted their care with us.

The AGD remains grateful for the ongoing dialogue, participation, and inclusion in forum discussions with OSAP. Our membership is interested in hearing the outcomes and/or next-steps arising from the July 24<sup>th</sup> session. Please keep us informed and call upon us whenever necessary.

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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<sup>1</sup> <https://www.ada.org/en/science-research/health-policy-institute/dental-statistics/workforce>