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April 23, 2020

John Howard, MD,  
National Institute of Occupational Safety and Health (NIOSH)  
Patriots Plaza 1  
395 E Street, SW, Suite 9200  
Washington, DC 20201

Dear Dr. Howard:

The Academy of General Dentistry (AGD) represents 39,000 general dentists who provide the full range of dental care to patients across the country. The AGD respectfully requests active participation in ongoing discussions, deliberation and development of guidelines for dental facilities as America reopens.

The Occupational Safety and Health Administration (OSHA) guidance states dental health personnel have a very high-risk exposure to infected but asymptomatic patients.<sup>1</sup> In light of that, the intention of general dentists is to use the highest level of personal protective equipment (PPE) as possible.

Furthermore, the AGD is supportive of point-of-care testing and has advocated for discretionary authority to conduct testing for the novel coronavirus (COVID-19) in order to screen asymptomatic persons prior to care.

Several states are set to reopen this and next week. General dentists will be resuming the practice of elective procedures in those select states. Dentistry has a strong record of leading in infection control, as it did during the HIV/AIDS crisis. While general dentists will practice enhanced infection control and the highest PPE available, we are also mindful that a vaccine may or may never be available for COVID-19, nor do we expect universal testing prior to opening up the economy.

We ask guidelines be reasonable and attainable with the recognition that all health care facilities and personnel assume a small amount of risk until this infectious disease is eradicated. The AGD requests active, ongoing participation in the development of CDC guidance. Thank you very much for your consideration. Please do not hesitate to contact Mr. Pat O'Connor at [patoconnor@kentoconnor.com](mailto:patoconnor@kentoconnor.com).

Sincerely,

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

Connie L. White, DDS, FAGD

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<sup>1</sup> U.S. Department of Labor, Occupational Safety and Health Administration, Guidance on Preparing Workplaces for COVID-19 (2020).