

January 21, 2021

The Honorable Xavier Becerra
Secretary-designate
U.S. Dept. of Health & Human Services
200 Independence Avenue, SW
Washington, D.C. 20201

Bechara Choucair, M.D.
Vaccinations Coordinator
White House COVID-19 Response Team
1600 Pennsylvania Ave, NW
Washington, DC 20500

Re: Expanding Authorization for Dental Professionals to Order and Administer COVID-19 Vaccinations

Dear Secretary-designate Becerra and Dr. Choucair,

On behalf of the Academy of General Dentistry (AGD) and its 39,000 members, we would like to communicate our support for President Biden's plan¹ to amend the current COVID-19 Public Readiness and Emergency Preparedness (PREP) Act declaration to permit certain qualified professionals not licensed under state law to administer vaccines to be able to do so.

We strongly urge you to **include qualified and licensed dentists** (D.D.S./D.M.D.) as professionals permitted to order and administer COVID-19 vaccines. Dentists are essential primary health care providers who continue to serve on our nation's frontlines and have both the experience and expertise to help the nation's pandemic response efforts.

Licensed dentists are trained in human anatomy, physiology, and pathophysiology as well as in administering intra-oral local anesthesia. It is arguably technically more difficult to administer an inferior alveolar nerve block inside the oral cavity than to administer a subcutaneous or intramuscular vaccine to an exposed arm.

Several states are already allowing dentists to administer COVID-19 vaccines², and expanding the scope of practice, particularly during times of health crisis, is not unprecedented.

We should make every effort to reduce barriers associated with immunization disparities in this country during these unique circumstances. With factors including lack of access and insurance, public distrust in science, and concerns about vaccine side-effects and safety affecting vaccination rates, we must do everything we can to ensure those wishing to get a COVID-19 vaccine can do so once they are available. Utilizing dentists can increase accessibility to the vaccine, particularly in rural areas where people may not have access to clinics or drug stores.

As you and your colleagues work to finalize a national COVID-19 vaccination strategy, AGD implores you to leverage all methods feasible to expand the scope of practice for dentists to administer vaccines in order to aid in outbreak prevention and control. We stand ready to assist with the logistics and practical implementation questions of the expanded scope of practice,

¹ FACT SHEET: President-elect Biden Outlines COVID-19 Vaccination Plan, Biden-Harris Transition (<https://buildbackbetter.gov/uncategorized/fact-sheet-president-elect-biden-outlines-covid-19-vaccination-plan/>)

² COVID-19 Vaccine Regulations for Dentists Map, American Dental Association (<https://success.ada.org/en/practice-management/patients/covid-19-vaccine-regulations-for-dentists-map>)



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including but not limited to insurance code and reimbursement questions; vaccine acquisition, preservation, and disposal; and immunization reporting requirements.

We look forward to working with you during this critical time to protect our nation's health. 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 black ink, appearing to read 'Bruce Cassis', with a long horizontal flourish extending to the right.

Bruce Cassis, D.D.S., MAGD
President
Academy of General Dentistry

A handwritten signature in black ink, appearing to read 'Myron Bromberg', with a long horizontal flourish extending to the right.

Myron (Mike) Bromberg, D.D.S.
Congressional Liaison
Academy of General Dentistry

CC: Sean McCluskie, HHS Chief of Staff