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March 12, 2021

Mr. Jeffrey Zients
Coordinator and Counselor to the President
COVID-19 Pandemic Response
The White House
1600 Pennsylvania Ave., NW
Washington, DC 20500

Rochelle P. Walensky, MD, MPH
Director
Centers for Disease Control & Prevention (CDC)
1600 Clifton Rd., NE
Atlanta, GA 30333

Anthony S. Fauci, MD
Director, National Institute of Allergy and Infectious Diseases (NIAID)
National Institutes of Health
31 Center Dr. # 7A03
Bethesda, MD 20892

Dear Mr. Zients, Dr. Walensky and Dr. Fauci:

The Academy of General Dentistry (AGD) represents 39,000 general dentists who provide a full range of dental care to patients across the country.

This letter is in response to correspondence received by you, dated February 15, 2021, from concerned individuals urging “immediate action” by the CDC, OSHA and the Biden administration on the following:

- Issue an OSHA emergency standard to stop decontamination of N95 filtering facepiece respirators (FFRs) and reuse in health care workers (HCW)
- Stop the use of non-respirator surgical masks for HCW
- The adoption of standards for barrier face covering for the public
- Creation of a national effort to enhance and distribute NIOSH-certified respirators
- Use the Defense Production Act to increase production of N95 FFRs

Concern over inhalation exposure to SARS-CoV-2 has remained front and center for the AGD due to the nature of our occupation. As an industry we continue to follow the evolving body of evidence regarding transmission and infection rates. Data collected over this past year directly contradicts the assertions and thereby the recommendations offered by the “concerned individuals.”

Numbers reported by the CDC in September of 2020 indicate an overall infection rate in the U.S. population of more than 15%.¹ The current CDC data reports 419,469 health care personnel cases of SARS-CoV-2.² Using NIOSH’s numbers of health care workers in the U.S. of 18 Million,³ the rate of infection among the broadly defined term of “health care workers” is 2.3%. Considering the CDC

¹ Heather Reese, A Danielle Iuliano, Neha N Patel, Shikha Garg, Lindsay Kim, Benjamin J Silk, Aron J Hall, Alicia Fry, Carrie Reed, Estimated Incidence of Coronavirus Disease 2019 (COVID-19) Illness and Hospitalization—United States, February–September 2020, *Clinical Infectious Diseases*, 2020; ciaa1780, <https://doi.org/10.1093/cid/ciaa1780>

² <https://covid.cdc.gov/covid-data-tracker/#health-care-personnel>

³ <https://www.cdc.gov/niosh/topics/healthcare/default.html>

acknowledged survey limitations, even if the number of infected was doubled, the rate of infection remains remarkably lower than that of the general population (>15%). Finally, the Health Policy Institute published data in the November 2020 issue of the Journal of the American Dental Association (JADA), reporting the SARS-CoV-2 infection rate specifically among dentists to be 0.9%.⁴

These data reflect the reality of current infection control practices in place since the beginning of the pandemic. They validate and justify continued employment of those same practices and do not evince the need for modification or augmentation measures suggested by the concerned individuals.

The AGD and the dental community at large remain focused on the safety of our patients, our staff and ourselves. For more than three decades, dentistry has led the charge on infection control. We recognize and welcome this important leadership role as well as the responsibilities associated with this duty. We therefore recommend that current infection control protocols, that are based on established scientific evidence and proven by the data to be effective, remain unchanged until the data proves modifications are indicated.

We look forward to our continued collaboration with all of you. Please feel free to reach me or Mr. Dan Buksa, Associate Executive Director, Public Affairs of the Academy of General Dentistry, and can be reached at 312.440.4328 or Daniel.buksa@agd.org.

Sincerely,



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



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

⁴ Cameron G. Estrich, et.al. Estimating COVID-19 Prevalence and Infection Control Practices Among U.S. Dentists. JADA 151(11) November 2020. <https://jada.ada.org/action/showPdf?pii=S0002-8177%2820%2930658-9>