

December 16, 2020

Robert R. Redfield, M.D.
Director
Centers for Disease Control and Prevention
1600 Clifton Road NE
Atlanta, GA 30329

Re: COVID-19 Vaccination Playbook for Jurisdictional Operations

Dear Dr. Redfield:

The undersigned organizations respectfully ask the Centers for Disease Control and Prevention (CDC) to clarify that dental, autopsy, and laboratory personnel are included in the Advisory Committee on Immunization Practices (ACIP) recommendation to give health care personnel priority access to a COVID-19 vaccine. The recommendation will eventually be reflected in CDC's COVID-19 Vaccination Playbook for Jurisdiction Operations.

The Advisory Committee on Immunization Practices (ACIP) recently recommended that vaccinations in the initial phase of the COVID-19 vaccination program (Phase 1a) should be offered to health care personnel and residents of long-term care facilities. The discussion at its meeting of December 1, 2020, suggests that ACIP intended for its definition of "health care personnel" to be broad and inclusive of all health care workers "who have the potential for direct or indirect exposure to patients or infectious materials."

For us, there is little question that ACIP intended for its recommendation to apply broadly to all health care workers. As a matter of due diligence, however, we would ask you to clarify that ACIP's recommendation includes dental, autopsy, and laboratory personnel.

ACIP's definition of "health care personnel" appears to be based, in part, on the term "healthcare personnel (HCP)" in CDC's 2019 Guideline for Infection Control in Healthcare Personnel (2019). The term is open to misinterpretation, however, because that particular infection control guideline states, "For this update, HCP does not include dental healthcare personnel, autopsy personnel, and laboratory personnel, as recommendations to address occupational infection prevention and control (IPC) services for these personnel are posted elsewhere."

We are convinced that ACIP did not intend to exclude *any* health care workers from its recommendation to offer vaccinations to health care personnel in the initial phase of the COVID-19 vaccination program (Phase 1a). However, we would hate for jurisdictions to overlook dental, autopsy, and laboratory personnel because of a minor footnote in guidance that was developed for an entirely different purpose (i.e., infection control).

Again, we respectfully ask CDC to clarify in its COVID-19 Vaccination Playbook for Jurisdiction Operations that all health care workers—including dental, autopsy, and laboratory personnel—are among those who should be given priority access to a vaccine during the initial phase of the COVID-19 vaccination program (Phase 1a).

Robert R. Redfield, M.D.

December 16, 2020

Page 2

Thank you for considering our request. If you have any questions, please contact Mr. Robert J. Burns at the American Dental Association. Bob can be reached at 202-789-5176 or burns@ada.org.

Sincerely,

American Dental Association
Academy of General Dentistry
American Academy of Oral and Maxillofacial Pathology
American Academy of Oral and Maxillofacial Radiology
American Academy of Pediatric Dentistry
American Academy of Periodontology
American Association of Bioanalysts
American Association for Clinical Chemistry
American Association of Endodontists
American Association of Oral and Maxillofacial Surgeons
American Association of Orthodontists
American Association of Women Dentists
American College of Prosthodontists
American Medical Technologists
American Society for Clinical Laboratory Science
American Society for Clinical Pathology
American Society of Cytopathology
American Society of Dentist Anesthesiologists
American Student Dental Association
Association of Pathology Chairs
Hispanic Dental Association
National Association of Dental Laboratories
National Association of Medical Examiners
National Independent Laboratory Association
National Society for Histotechnology