

August 26, 2020

Casey Hannan, MPH  
Acting Director, Division of Oral Health  
Centers for Disease Control & Prevention (CDC)  
1600 Clifton Rd.  
Atlanta, GA 30329

Dear Mr. Hannan:

The Academy of General Dentistry (AGD) represents 39,000 general dentists who provide the full range of dental care to patients across the country. We thank you for including AGD representatives in ongoing discussions, deliberations, and development of guidelines for dental facilities as America continues to resume standard essential dental care.

AGD dentists are committed to the safest experience possible for our patients, our staff and ourselves. To that end, clear, practicable guidance as well as attainable regulations are not only invaluable to practitioners; they serve to decrease consumer confusion.

The CDC's most recent iteration of the "Interim Infection Prevention and Control Guidance for Dental Settings During the Coronavirus Disease 2019 (COVID-19) Pandemic," (August 4, 2020) includes changes that the AGD and its members consider difficult to attain and at odds with existing Occupational Safety and Health Administration (OSHA) guidelines.

Regarding the use of N95 masks, the most recent update to CDC Guidelines substituted prior wording of "*consider* the use of N95..." and strengthened it to "*should use* an N95..." during aerosol generating procedures. AGD members, and the dental community at large, continue to experience PPE vendor supply shortages with the inability to procure N95 masks. NPR provided coverage of this national problem as recently as August 19<sup>th</sup>.<sup>1</sup>

Prior CDC Guidelines (May 19, 2020) allowed for flexibility when N95s are not available. A face-shield plus the highest-level mask available was considered an acceptable alternative. During the last three months, over 170,000 U.S. dentists have delivered treatment using those guidelines without incident. Until the supply limitation of N95 masks is resolved but more importantly, sound, scientific research establishes N95 masks as the minimum level of protection, the AGD respectfully asks that the CDC return to its less compulsory language in its guidance.

In a June 1<sup>st</sup> conversation between AGD and OSHA officials, PPE guidelines were described by OSHA as "adaptable." The AGD believes the inclusion of that term in subsequent federal guidance documents is an important distinction and helpful to AGD members as the pandemic

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<sup>1</sup> <https://www.npr.org/2020/08/19/903612006/yep-masks-and-protective-gear-are-still-hard-get-especially-for-small-buyers>

continues. The Academy urges amended guidance to allow for alternative personal protective equipment (PPE) combinations based upon the clinical judgment of the professional licensee in their jurisdiction of practice.<sup>2</sup> The intention of general dentists is to use the highest level of PPE as necessary for personal, staff, and patient protection.

As mentioned, consumers and regulatory agencies look to the CDC guidance to stay informed and establish standards. Creating an expectation that dental professionals *should use* N95 masks during treatment, when acquiring those masks is impossible, perpetuates confusion and diminishes patient confidence in the dental-care delivery system. All patients require regular dental care. Especially in the time of COVID-19, uncertainty and/or lack of confidence is an easy disruptor of that care.

Over the last 35 years dentistry has led the charge in healthcare infection control. General dentists aim to maintain the professions stellar safety record and will continue to practice infection control with the highest PPE necessary and available. The AGD respectfully urges the CDC to amend its current language and return to the heretofore effective and attainable N95 recommendations posted on May 19, 2020.

Please feel free to reach me or Mr. Pat O'Connor, the Academy of General Dentistry, Washington Representative, can be reached at 703/351-6222 or [patoconnor@kentoconnor.com](mailto:patoconnor@kentoconnor.com).

Sincerely,



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<sup>2</sup> M. Emmanuel Bhaskar, MD, Santhanan Arun, MBBS, SARS-CoV-2 Infection Among Community Health Workers in India Before and After Use of Face Shields. *JAMA*. Published online August 17, 2020. doi:10.1001/jama.2020.15586