

September 4, 2020

William H. Foege, M.D., M.P.H.
Helene Gayle, M.D., M.P.H.
Committee Co-Chairs
Committee on the Equitable Allocation
of Vaccine for the Novel Coronavirus
National Academies of Sciences, Engineering, and Medicine (NASEM)
Submission via: <https://www.nap.edu/vaccine/>

Dear Drs. Foege and Gayle:

The Academy of General Dentistry (AGD) represents 39,000 general dentists who provide the full range of dental care to patients across the country. AGD dentists are committed to the safest experience possible for our patients, our staff, and ourselves. We agree that the goal of protecting the public's health is intertwined with the goal of protecting society's well being. The COVID-19 pandemic has produced unprecedented disruptions to the economies of the U.S. and the nations of the world.

Dentists are essential health care workers and should be offered early access to vaccines. We are pleased to see that dentists are included as frontline health care clinicians (page 59, line 1275) as the highest priority group for the initial phase rollout of vaccines. The AGD agrees with the phased in approach to vaccine allocations listed on pages 58-81 but we also implore flexibility within states and localities to prioritize community spread of COVID-19, as it occurs.

- Phase 1 of vaccine allocation includes: high-risk workers in health care facilities, first responders, patients with significant co-morbid conditions, and older adults in congregate or overcrowded settings.
- Phase 2 is comprised of critical risk workers, teachers and school staff, people with moderate co-morbid conditions, all older adults, people in homeless shelters and group homes, and incarcerated/detained people and staff.
- Phase 3 consists of young adults, children and other critical risk workers (not already included in phase 2).

Allocation of vaccines to prevent SARS-CoV-2 that causes COVID-19 must be predicated on sound safety and effectiveness data. The AGD strongly advises against premature FDA approval or Emergency Use Authorization (EUA) of vaccines that cannot be assured to be safe and effective. The AGD is supportive of dentists administering vaccines and acting as a workforce multiplier to assist during and following the COVID-19 pandemic.

While this NASEM committee did not consider therapeutics for COVID-19 in the scope of the *Discussion Draft of the Preliminary Framework for Equitable Allocation of COVID-19 Vaccine (2020)*, the AGD urges the medical community to continue to publish data on those therapies that prove to effectively treat COVID-19.¹ The *JAMA* recently published studies with favorable outcomes on the use of corticosteroids for the novel coronavirus.² Since some portion of the population is vaccine hesitant, successful treatment of COVID-19 cases is essential to contain this disease, reduce morbidity and mortality, and hasten a return to economic prosperity and reduce unemployment.

We thank you for producing this report and the considerable input and expertise of your committee. 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.

Sincerely,



Connie L. White, D.D.S., FAGD

AGD President

whiteco@umkc.edu

¹ Committee on the Equitable Allocation of Vaccine for the Novel Coronavirus. National Academy of Science Engineering and Medicine. Discussion Draft of the Preliminary Framework for Equitable Allocation of COVID-19 Vaccine (2020) ISBN 978-0-309-68222-0 | DOI 10.17226/25914 <https://www.nap.edu/catalog/25914/discussion-draft-of-the-preliminary-framework-for-equitable-allocation-of-covid-19-vaccine>

² Association Between Administration of Systemic Corticosteroids and Mortality Among Critically Ill Patients with COVID-19: A Meta-analysis. *JAMA*. September 2, 2020. DOI10.1001/jama.2020.17023 <https://jamanetwork.com/journals/jama/fullarticle/2770279>