

April 27, 2020

Ajit Pai  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Dear Chairman Pai:

On behalf of the 163,000 members of the American Dental Association (ADA), we are writing to you in regards to the COVID-19 Telehealth Program. The ADA respectfully requests that this program be extended to all dental practices, regardless of size, location, or for-profit status.

The ADA thanks the Federal Communications Commission (FCC) for its work in implementing the COVID-19 Telehealth program. Telehealth, including teledentistry, is an important way to ensure access to care for patients during a pandemic.

On March 16, the ADA called upon dentists to postpone elective procedures.<sup>1</sup> And during the week of April 6, a survey of dentists across the country found that almost 80% report they are only seeing emergency patients.<sup>2</sup> Dentists are only seeing emergencies in order to slow community spread, preserve medical supplies, and relieve emergency departments (EDs) from seeing dental patients.

Dentists use virtual screening to determine the nature of patient dental emergencies. The ADA Interim Guidance for Minimizing Risk of COVID-19 Transmission urges dentists to “make every effort to interview the patient by telephone, text monitoring system, or video conference before the visit.”<sup>3</sup> Video conference is an especially effective way to screen dental emergencies. But dentists who are facing significant economic burdens due to the pandemic need access to FCC funds in order to afford teledentistry costs such as software to electronically message and screen patients, upgrades to the office computer system, upgrades to the office internet, extra-oral X-ray imaging equipment, digital sensors and X-ray units, and digital cameras and intra-oral cameras. This is the case regardless of the dental practice’s size, location, or for-profit status.

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<sup>1</sup> ADA Calls Upon Dentists to Postpone Elective Procedures, March 16, 2020, <https://www.ada.org/en/press-room/news-releases/2020-archives/march/ada-calls-upon-dentists-to-postpone-elective-procedures>.

<sup>2</sup> ADA Health Policy Institute, COVID-19: Economic Impact on Dental Practices, Week of April 6 Results, <https://surveys.ada.org/reports/RC/public/YWRhc3VydmV5cy01ZThkZDViMDA3YTZhODAwMTAzZTViZTgtVVJfNWlJWDFFU01ldmNDUIVQ>.

<sup>3</sup> ADA Interim Guidance for Minimizing Risk of COVID-19 Transmission, [https://www.ada.org/~media/CPS/Files/COVID/ADA\\_COVID\\_Int\\_Guidance\\_Treat\\_Pts.pdf](https://www.ada.org/~/media/CPS/Files/COVID/ADA_COVID_Int_Guidance_Treat_Pts.pdf).

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The ADA therefore urgently requests that the FCC reconsider its decision to limit participation in the COVID-19 Telehealth Program to the health care providers that fall within the categories of health care providers in section 254(h)(7)(B) of the 1996 Telecommunications Act.<sup>4</sup> The Coronavirus Aid, Relief, and Economic Security (CARES) Act says that the FCC *may* limit the Telehealth Program to such providers, but does not require the Commission to do so. The ADA urges the FCC to reconsider its decision and allow all dentists to apply for the Telehealth Program funds.

Thank you for your consideration of this important issue. The ADA looks forward to continuing to work with the FCC. Should you have any questions, please do not hesitate to contact Ms. Roxanne Yaghoubi at (202) 415-0187 and [yaghoubir@ada.org](mailto:yaghoubir@ada.org).

Sincerely,

Chad P. Gehani, D.D.S.  
President

Kathleen T. O'Loughlin, D.M.D., M.P.H.  
Executive Director

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<sup>4</sup> These providers include: 1) Post-secondary educational institutions offering health care instruction, teaching hospitals, and medical schools; (2) community health centers or health centers providing health care to migrants; (3) local health departments or agencies; (4) community mental health centers; (5) not-for-profit hospitals; (6) rural health clinics; (7) skilled nursing facilities; or (8) consortia of health care providers consisting of one or more entities falling into the first seven categories.