

September 4, 2020

Committee on Equitable Allocation of Vaccine for the Novel Coronavirus  
National Academies of Sciences, Engineering, and Medicine  
500 Fifth Street N.W.  
Washington, D.C. 20001

Re: Preliminary Framework for Equitable Allocation of COVID-19 Vaccine

To Whom It May Concern:

On behalf of our 163,000 members, we are pleased to comment on the Discussion Draft of the Preliminary Framework for Equitable Allocation of Vaccine for the Novel Coronavirus (SARS-CoV-2). Commissioned by the National Institutes of Health and the Centers for Disease Control and Prevention, the Framework will be used to inform policy decisions about distributing the initial supply of a safe and effective SARS-CoV-2 vaccine.

We would like to thank the Committee for recommending that dentists and their teams be placed in Tier 1 of those who should be afforded early access to a safe and effective SARS-CoV-2 vaccine. Doing so affirms what we have long known: Dentistry is an essential health care service and dentists and their teams are essential health care workers. We urge you to consider including dental assistants, as well, since they are also an integral part of the dental team.

There is nothing routine about dental care. Beyond treating immediate pain, dentists evaluate, diagnose, prevent, and treat diseases that can be life-changing or even life-threatening. For example, early detection of oral cancers and serious infections can lead to early treatment. Delaying treatment for months, weeks, or even days can make the difference between dying early, having a life-changing abnormality, and living a normal, healthy life.

Dental care is also essential to managing some chronic diseases, like diabetes. The inflammation associated with gum disease or a tooth abscess can make it harder for diabetics to control blood sugar. Moreover, because dentists are trained to recognize early signs and symptoms of diabetes, they can help patients avoid serious diabetes-related complications by referring patients for medical follow-up.

Although no SARS-CoV-2 cases have been attributed to contact between dental staff and patients—and dentists have implemented more safeguards than ever to prevent its spread—15 percent of the American public still does not feel comfortable visiting the dentist without a medical breakthrough, such as an approved SARS-CoV-2 vaccine.<sup>1</sup> Knowing dentists and their teams have been vaccinated will help reassure those patients that it is safe to resume dental appointments and benefit from these essential health care services.

Again, we applaud your thoughtful consideration of how to allocate the early supply of a safe and effective SARS-CoV-2 vaccine. Counting dentists and their teams among the essential health care workers who should receive Tier 1 access will reduce the occurrence of serious

life-changing diseases, and possibly even save lives. We urge you to consider including dental assistants, as well, since they are also an integral part of the dental team.

If you have any questions, please contact Mr. Robert J. Burns at 202-789-5176 or burnsr@ada.org.

Sincerely,

/s/

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

/s/

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

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<sup>1</sup> Engagious, Back to Normal Barometer, July 22, 2020.