

November 30, 2020

The Honorable Joseph R. Biden, Jr.  
President-Elect of the United States

The Honorable Kamala Harris  
Vice President-Elect of the United States

Dear President-Elect Biden and Vice President-Elect Harris:

The American Dental Association (ADA) and its 163,000 members congratulate you on winning the 2020 General Election and we look forward to collaborating with your administration. During this period of surging COVID-19 cases, we also wanted to make you aware of our organization's priorities relating to COVID-19 and access to oral health care.

We believe that the following should be oral health care priorities for the new administration within its first 100 days:

- Including dentist advisors in all appropriate posts to advise your administration on oral health care, especially a chief dental officer at the Centers for Medicare and Medicaid Services (CMS).
- Giving temporary and targeted liability protection to small businesses that follow applicable public health guidelines during the pandemic, including dentists who conduct FDA-approved tests and administer FDA-approved vaccines.
- Including dentists, who are essential health care workers, in Phase 1a of those who should receive early access to the COVID-19 vaccine. This recommendation was made recently by the National Academies of Sciences, Engineering, and Medicine.<sup>1</sup>
- Reversing the Medicaid provisions of a recent interim final rule that allows states receiving additional Medicaid funding the flexibility to cut optional benefits, such as adult dental health care.<sup>2</sup>
- Continuing to work with the dental community to address operating room access issues that have been further exacerbated by COVID-19 as hospitals were and are again being forced to limit elective surgical procedures to address the strain of the pandemic on operating room access.<sup>3</sup>
- Reducing regulatory burdens on providers within the Medicaid program to help prevent dental providers from disenrolling in Medicaid during this period of increased utilization.<sup>4</sup>

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<sup>1</sup> National Academies of Sciences, Engineering, and Medicine, [A Framework for Equitable Allocation of Vaccine for the Novel Coronavirus](#) (Page 113), 2020.

<sup>2</sup> [Additional Policy and Regulatory Revisions in Response to the COVID-19 Public Health Emergency](#), CMS-9912-IFC, October 28, 2020.

<sup>3</sup> [American Dental Association & American Academy of Pediatric Dentistry Letter](#), November 17, 2020.

<sup>4</sup> American Dental Association Health Policy Institute, "COVID-19: Economic Impact on Dental Practices," [Survey](#) (Slide 14), August 2020.

- Ensuring medical supplies (e.g., surface disinfectants) and personal protective equipment (e.g., masks) are available when and where they are most needed during the COVID-19 pandemic, including all dental offices.

In Congress, we have urged consideration of another coronavirus relief package and recently highlighted policies that are crucial to ensuring access to dental care and the safety and economic stability of dental practices across the country, including:

- Providing tax credits to small businesses for the purchase of additional personal protective equipment and safety improvements to the office.
- Extending the deferment of payments and interest on federal student loans and considering policies that would provide deferments for privately held student loans.
- Providing additional flexibility for the Paycheck Protection Program (PPP) loans, which 90% of dentists surveyed applied for,<sup>5</sup> by allowing borrowers to:
  - Deduct expenses paid for with PPP loans.
  - Take advantage of the Employee Retention Tax Credit.
  - Utilize a more streamlined forgiveness process.
  - Access additional PPP loans and permitting 501(c)(6) organizations to apply for new PPP funds.
  - Use future PPP loans to purchase personal protective equipment.
- Incentivizing health care practitioners to work in health-disadvantaged communities that have been further undermined by COVID-19 by providing tax credits, federal grants, additional student loan repayment, and other assistance.
- Protecting the public health infrastructure which includes expanding and extending funding for community health centers, teaching health centers, and the National Health Service Corps.

Many thanks for your work on these important issues. We would welcome the opportunity to meet with your staff to discuss them further. Please contact Roxanne Yaghoubi, the ADA's director of legislative and regulatory policy, at [yaghoubir@ada.org](mailto:yaghoubir@ada.org). Additional information is also available at [ADA.org/covid19advocacy](https://ADA.org/covid19advocacy).

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<sup>5</sup> American Dental Association Health Policy Institute, "COVID-19: Economic Impact on Dental Practices," [Survey](#) (Pages 35-49), September 2020.

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Sincerely,



Daniel J. Klemmedson, D.D.S., M.D.  
President



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

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