

April 17, 2020

ADM Brett P. Giroir, M.D.
Assistant Secretary for Health
U.S. Department of Health and Human Services
200 Independence Avenue SW
Room 715-G
Washington, DC 20201

Re: Guidance authorizing dentists to administer COVID-19 tests

Dear Dr. Giroir:

On behalf of our 163,000 members, we respectfully ask your office to issue federal recognition that licensed dentists may administer point of service tests authorized by the Food and Drug Administration (FDA) for novel coronavirus (COVID-19) under their existing scope of practice. Doing so would allow dentists to qualify as “covered persons” under the Public Readiness and Emergency Preparedness Act (PREP Act), which may extend protection from liability associated with the administration or use of FDA-authorized COVID-19 tests.

Dentistry is essential to the public’s health. Enabling dentists to test patients prior to dental treatment will help lower the “very high exposure risk” of dental personnel in contracting COVID-19 when treating infected but asymptomatic patients.¹ It would add a layer of safety for both dental personnel and the patients they treat. This is important not only now—when most dentists are performing only urgent and emergency dental procedures—but also as the nation cautiously reopens.

Moreover, front-end testing would enable dental offices to optimize their personal protective equipment (PPE). Optimizing the use of PPE is particularly important now, when PPE is scarce in all health care settings, including emergency departments.

For these reasons, we urge you to issue federal recognition for dentists to administer FDA-authorized COVID-19 diagnostic tests as soon as possible. We recognize that these testing kits are currently scarce. However, approving dentists to administer these tests now will expand the nation’s medical surge capacity, optimize the use of PPE in health care settings, and create a safer environment for treating dental patients who would otherwise seek care in overburdened emergency departments.

It is worth noting that every year more than 27 million people visit a dentist, but not a physician.² Federal guidance for dentists to administer FDA-authorized COVID-19 tests would help make every encounter an opportunity to test those individuals.

Thank you for considering our request. We applaud your leadership on this issue and hope the COVID-19 pandemic will soon be under control. If you have any questions, please contact Mr. Robert J. Burns at 202-789-5176 or burnsr@ada.org.

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Sincerely,

/s/

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

/s/

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

CPG:KTO:rjb

¹ U.S. Department of Labor, Occupational Safety and Health Administration, Guidance on Preparing Workplaces for COVID-19 (2020).

² American Dental Association, Screening for Chronic Diseases in the Dental Office, 2020.