

August 6, 2020

Mr. Timothy J. Shea
Acting Administrator
U.S. Drug Enforcement Administration
8701 Morrissette Drive
Springfield, VA 22152

Dear Acting Administrator Shea:

On behalf of the 163,000 members of the American Dental Association (ADA), the world's oldest and largest dental professional organization, we are writing in regards to the Drug Enforcement Administration's (DEA) adjustment of the fee schedule for registration and reregistration for DEA certification.

Unfortunately, the scheduled DEA fee increases directly coincide with the ongoing COVID-19 pandemic that is causing a considerable economic impact on dental practices. As such, we request the DEA delay the effective date of the new fee schedule, which is currently scheduled to go into effect on October 1, 2020, for 12 months. This one-year delay will provide temporary fiscal relief for dentists until stabilization of the current crisis.

At the onset of the COVID-19 pandemic, dentists closed completely or limited their practices to emergency-only dental care, which caused significant financial hardship. Even as dental offices have reopened, they have had to implement new infection control procedures and are utilizing enhanced personal protective equipment (PPE). As you may not be aware, the cost of these health and safety efforts have been financially devastating to dentists and their small businesses. During this worrisome period, all additional fees, costs, and charges are not inconsequential as dental practices attempt to stay open, retain their employees, and provide their patients with care. We hope that you will consider the postponement of the DEA fee schedule increases until a time of greater economic stability.

The ADA thanks you for your leadership and supports the DEA in its mission to enforce the controlled substances laws and regulations of the United States. If you have any questions, please contact Dr. Robert Mitton at mittonr@ada.org.

Sincerely,

/s/

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

CPG:KTO:rhm

/s/

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