

**STATEMENT OF THE
AMERICAN DENTAL ASSOCIATION
TO THE
COMMITTEE ON EQUITABLE ALLOCATION OF VACCINE FOR THE
NOVEL CORONAVIRUS
NATIONAL ACADEMIES OF SCIENCES, ENGINEERING AND
MEDICINE**

ON

**A FRAMEWORK FOR EQUITABLE ALLOCATION OF VACCINE FOR
THE NOVEL CORONAVIRUS**

SUBMITTED BY

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Good afternoon. I am Dr. Kathy O'Loughlin, Executive Director of the American Dental Association, whose 163,000 members represent over 60 percent of practicing dentists in the United States. On behalf of the ADA, I want to thank you for this opportunity to provide comment.

We are pleased that the National Academies, the Centers for Disease Control and Prevention, and the National Institutes of Health are looking ahead to ensure the most vulnerable at-risk groups—including essential health care workers, high-risk Latino and Black communities, and the medically compromised elderly—are allowed early access to the vaccine.

In the early days of the SARS-CoV-2 pandemic, dentists were among the first health care providers to restrict practice on a very limited schedule, performing only urgent or emergency dental procedures. This was done to reduce possible transmission rates, to conserve personal protective equipment, and to continue providing basic emergency care to reduce the burden on already overrun hospital emergency departments.

Currently over 95% of dental practices are safely and effectively treating patients in their communities.

Twenty years ago, the United States Surgeon General issued a report on oral health, declaring “you can’t be healthy without good oral health.”

Routine dental care *is* essential health care and dentists and their teams *are* essential health care workers. Dentists evaluate and diagnose oral diseases that are directly linked to overall health. Preventing and treating those diseases relieves the burden on overwhelmed hospital emergency departments and can even save lives.

For example, a routine dental exam includes screening for oral cancer. Prevention is extremely important and early detection can lead to early treatment. This is especially important in the case of HPV-related cancers, which have caused a dramatic increase in oral cancer in the absence of traditional risk factors such as age, smoking, and alcohol intake. Delaying treatment for months or even weeks can make the difference between life and death.

Oral health has also been associated with overall health with gum disease related to incidence and/or severity of diabetes mellitus, cardiovascular disease, rheumatoid arthritis, anxiety/depression, dementia/Alzheimer's disease, and other systemic diseases. Delay and/or deferral of oral healthcare has the potential to affect the overall health of patients. Furthermore, recent CDC reports suggest that screening for systemic conditions could result in up to \$100 million dollars of healthcare expenditure savings annually. The role dentists play in the public's health is essential.

Additionally, dental pain is the number one cause of missing work and school, affects military readiness, and impacts the overall well-being of the population.

As essential health care workers, dentists and their teams also play a role in expanding the nation's medical surge capacity. For example, some states, such as North Carolina and Pennsylvania, have authorized dentists to test patients for SARS-CoV-2. Patients who test positive obviously need to be referred for an appropriate medical diagnosis and treatment. Several states—such as Illinois, Minnesota, and Oregon—also allow dentists to provide life-saving vaccinations.

It is also worth noting that every year more than 31 million people visit a dentist, but not a physician.¹ This makes every dental encounter an opportunity to test or vaccinate those individuals for SARS-CoV-2 in states that allow it.

Per a consumer survey from August 2020, 15% of the public is reluctant to return for dental appointments until a medical breakthrough—like a vaccine—is available.

Early access to a safe and effective SARS-CoV-2 vaccine will reassure that 15 percent of American patients that it is safe to resume dental appointments and will furthermore reassure dental healthcare practitioners who have reservations about delivery of dental care.

Health and Human Services agrees with the Federal Emergency Management Agency that dentistry is an essential health care service and dentists and their teams are essential health care workers.

We appreciate your thoughtful consideration of how to allocate the early supply of the vaccine, and we look forward to working with you, CDC, and NIH to ensure it is distributed in a way that maximizes the impact on the public's health.

¹ Medical Expenditure Panel Survey, May 2020 (no. HC-206B).