

November 20, 2020

Advisory Committee on Immunization Practices  
c/o Centers for Disease Control and Prevention  
1600 Clifton Road NE, MS H24-8  
Atlanta, GA 30329-4027.

Re: Docket No. CDC-2020-0117—Equitable Allocation of COVID-19 Vaccine

To Whom It May Concern:

On behalf of our 163,000 members, we respectfully ask the Advisory Committee on Immunization Practices to recommend that the Centers for Disease Control and Prevention incorporate dentists into its framework for distributing the COVID-19 vaccine. We offer these comments in response to your Federal Register notice of November 19, 2020 (85 FR 73712).

The Centers for Disease Control and Prevention has recognized that “there may be a limited supply of COVID-19 vaccine” and that “vaccination efforts will likely focus on those critical to the response, providing direct care, and maintaining societal function.” Unfortunately, dentists and their teams are not currently mentioned in the agency’s framework to help states “plan and operationalize a vaccination response to COVID-19.”<sup>1</sup>

The National Academies of Sciences, Engineering, and Medicine recently recommend that dentists and their teams be placed in Phase 1a of those who should be afforded early access to a COVID-19 vaccine.<sup>2</sup> Doing so affirmed what we have long known: Dentistry is an essential health care service and dentists and their teams are essential health care workers.

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.

Additionally, dentists and their teams can help increase the nation’s medical surge capacity when medical personnel are overwhelmed. Dentists are trained health care professionals who can administer critical vaccines to prevent life or health-threatening conditions—and protect the life and health of patients and staff at the point of care.

It is worth noting that every year more than 27 million people visit a dentist, but not a physician.<sup>3</sup> Every one of these encounters is an opportunity test and vaccinate these individuals for COVID-19.

Again, we respectfully ask ACIP to recommend that the CDC incorporate dentists and their teams into its framework for distributing the COVID-19 vaccine. Providing early access will help expand the nation's medical surge capacity and reduce the occurrence of serious life-changing diseases, and possibly even save lives.

Thank you for considering our request. We applaud your leadership on this issue and look forward to resolving this dire public health crisis. If you have any questions, please contact Mr. Robert J. Burns at 202-789-5176 or burns@ada.org.

Sincerely,

/s/

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

/s/

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

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<sup>1</sup> Centers for Disease Control and Prevention, COVID-19 Vaccination Program Interim Playbook for Jurisdiction Operations, Version 2.0, October 29, 2020.

<sup>2</sup> National Academies of Sciences, Engineering, and Medicine, A Framework for Equitable Allocation of Vaccine for the Novel Coronavirus, 2020.

<sup>3</sup> American Dental Association, Screening for Chronic Diseases in the Dental Office, 2020.