

June 8, 2012

Division of Viral Hepatitis
National Center for
HIV/AIDS, Viral Hepatitis, STD, and TB Prevention
Centers for Disease Control and Prevention
1600 Clifton Road NE, Mailstop G-37
Atlanta, Georgia 30333

Re: Docket No. CDC-2012-0005

To Whom It May Concern:

On behalf of our 157,000 members, we are pleased to register our support for the Centers for Disease Control and Prevention's (CDC's) draft recommendations for identification of persons with the hepatitis C virus (HCV). We offer our support in response to your Federal Register notice of May 22, 2012 (77 FR 30293).

The proposed recommendation for the identification of HCV expands upon the CDC's 1998 guidelines by recommending that persons born during 1945 through 1965 be tested for HCV.¹ The rates of HCV infection are disproportionately high in this age group.² Early identification and treatment will go a long way toward reducing the spread of HCV.

The proposed recommendation supports current CDC guidelines for controlling the spread of infections in dental offices.³ The prevalence of HCV among dentists is virtually non-existent and the small number of cases on record can be traced to blood transfusions performed before testing of the blood supply began in the 1990s.^{4,5}

The CDC has proposed a sensible public health recommendation for preventing the spread of HCV and we are pleased to offer our enthusiastic support. If you have any questions, please contact Mr. Robert J. Burns at 202-789-5176 or burnsr@ada.org.

Sincerely,

/s/

William R. Calnon, D.D.S.
President

/s/

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

WRC:KTO:rjb

¹ Centers for Disease Control and Prevention, *Recommendations for prevention and control of hepatitis C virus (HCV) infection and HCV-related chronic disease*, MMWR 1998; 47(RR19);1-39.

² Smith BD, Patel N, et al. Hepatitis C Virus Antibody Prevalence, Correlates and Predictors Among Persons born from 1945 through 1965, United States, 1999-2008. AASLD; 11/6/2011; San Francisco, CA (2011).

³ Centers for Disease Control and Prevention. *Guidelines for Infection Control in Dental Health-Care Settings*, 2003. MMWR 2003; 52(No. RR-17).

⁴ S.E. GRUNINGER, P. KANG, K.L. VOGT, C. SIEW, and D. MEYER 2007. Hepatitis C Infection among U.S. Dentists, 2000-05, *Journal of Dental Research*, 86 (Special Issue): #2877.

⁵ Thomas, D.L.; Gruninger, S.E.; Siew, C.; Joy, E.D.; and Quinn, T.C. 1996. "Occupational Risk for Hepatitis C Infections Among General Dentists and Oral Surgeons in North America." *American Journal of Medicine*, 100(1): 41-45.