

To: Ben Wakana, Biden/Harris HHS Review Team

From: B. Timothy Leeth, ADEA Chief Advocacy Officer

Date: January 4, 2021

Subject: COVID Vaccine Priorities

Highlights

- ADEA agrees with the priority set by the National Academy of Medicine Committee on vaccine priorities for health care personnel (HCP) in its October Framework report.
- ADEA also agrees with the CDC ACIP recommendation of Dec. 3 to prioritize HCP and with its definition of HCP.
- Dental students, both in dental schools, allied dental programs, and advanced education dental residents provide patient care must be included among the first health care professionals to receive inoculation.

Background

When the COVID-19 crisis erupted, university campuses closed the dental school clinics, which function as dental hospitals within the dental school buildings on campus only remained open to handle emergency cases, with faculty and residents providing the majority of care. However, even though this emergency care remained available, the majority of patients—many of them Medicaid or CHIP beneficiaries—were not able to receive needed care because of safety precautions instituted for the patients and providers. It is essential to ensure that practicing educator clinicians, students, and staff of these dental academic school facilities and hospitals receive the vaccine to protect them from the elevated risk they face as they provide the much-needed dental care to those unable to afford private practice fees. This is important to the overall health and well-being of the dental workforce and to the patients they care for.

Furthermore, it should be noted that the dental and allied dental students as well as the medical and nursing students who are providing patient care in these same health care facilities are also at high-risk and are included in CDC's Advisory Committee on Immunization Practices (ACIP) definition of Health Care Personnel (HCP). Dental school students begin spending much of their time in direct patient care during their third year of education and fourth year students are almost exclusively treating patients in various rotations. Dental residents are full-time patient care practice during their training in their specialty.

Dental hygiene students begin caring for patients during the first semester of their education.

Problem

The relationship between oral and systemic health has long been well documented in the dental and medical literature. For instance, periodontal disease found in the oral cavity has been associated with a number of general health conditions, including heart disease and diabetes. HIV can now be detected with saliva samples rather than more invasive testing methods. Dental caries is the leading chronic disease among children, impacting 25% of those aged 2-5 years and 50% aged 6-8 years. All of these realities justify the Committee's conclusion that oral health professionals are vitally important to primary care.

In communities across the country, dental school clinics are part of the dental safety net, delivering dental care to the economically disadvantaged, the uninsured and underinsured, and those residing in rural and urban dental shortage areas. According to the Health Resources and Services Administration, the United States has more than 6,300 dental shortage areas where 60 million people do not have adequate access to dental care. In academic year 2016-2017, U.S. dental school clinics provided much needed dental care during 2.7 million patients' visits.

The American Dental Education Association (ADEA) concurs with *The National Academies'* Committee on Equitable Allocation of Vaccine for the Novel Coronavirus [recommendations](#) that "high-risk workers in health care facilities," including clinicians, such as dentists and dental hygienists, need to be among the first to receive the COVID-19 vaccine. Additionally, ADEA supports the National Academies Committee's recognition and inclusion of other members of the dental health care team including dental assistants and dental therapists as well as the AHP's Dec. 3 [recommendations](#) and definition of HCP, which includes students and residents.

Action Needed

Immunization against the COVID-19 virus is an all hands on-deck national emergency and every health care professional trained to provide injections should be enlisted to do so, including licensed dentists. ADEA and our member institutions stand ready to assist HHS, Jeff Zients, Coordinator of the COVID-19 Response and Counselor to the President in the White House, or anyone else so designated.

Licensed dental professionals, such as dentists and hygienists, and dental therapists, are trained administering intra-oral local anesthesia. It is arguably technically more difficult to administer an inferior alveolar nerve block inside the oral cavity than to administer a subcutaneous or intramuscular vaccine to an exposed arm.

Please feel free to contact me any time of the day or night at 202-236-5354 (my mobile number) or via email at leeth@adea.org. Thank you for your attention.

About ADEA—The American Dental Education Association (ADEA) is The Voice of Dental Education. ADEA members include all 68 U.S. dental schools, over 1,000 allied and advanced dental education programs, over 60 corporations, and more than 18,000 individuals. ADEA is the sole national organization representing academic dentistry, both dentists and the allied health professions.