

November 5, 2021

Office of the Assistant Secretary for Planning and Evaluation
Strategic Planning Team
Attn: Strategic Plan Comments
U.S. Department of Health and Human Services
200 Independence Avenue, SW, Room 434E
Washington, DC 20201

To Whom It May Concern:ington, s4d[BT1 ooETBT1 0 0 1 115.46 543.5piBT1BDC B1BTbTYS-5()-5(S)2

Despite many oral health advancements over the last half century, oral health disparities and inequities continue. The Surgeon General's 2000 report titled "Oral (alth in reri i en i ied s s e a dispFritie ` and in uities itÄ cs al e ri

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health workers, health care paraprofessionals, direct support professionals,

Produced fact sheets and frequently asked questions about OSHA and Centers for Disease Control and Prevention (CDC) guidelines.

Secured 4.5 million KN95 face masks from the national stockpile and distributed them to dentists in states where masks were in low supply.

Produced mask and face shield guidelines, N95 respirator fit and seal check guidance, and tips to avoid counterfeit products.

Offered guidance on providing point-of-care testing at dental offices.

Furnished guidance to minimize the risk of exposure when there were shortages of the recommended personal protective equipment.

We would note that in January 2021, the CDC affirmed what we have long known: Dentists are essential health care personnel and dental care is an essential health care service.¹ The decision was consistent with the roles carved out for dentistry in the Declaration Under the Public Readiness and Emergency Preparedness Act for Medical Countermeasures Against COVID-19² and codified in sections 101 and 203 of the Pandemic and All-Hazards Preparedness Act.³

Objective 2.3: Enhance promotion of healthy behaviors to reduce occurrence and disparities in preventable injury, illness, and death.

ADA Comment: [Dental caries remains the most common preventable chronic disease of children](#). Education is critical to our management of early childhood caries. Evidence-based population health measures, such as community water fluoridation, should be optimized to reduce the prevalence of dental disease and promote oral health-related quality of life.

Objective 3.1: Provide effective and innovative pathways

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Sincerely,

Cesar R. Sabates, D.D.S.
President

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

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¹ Centers for Disease Control and Prevention, Interim List of Categories of Essential Workers Mapped to Standardized Industry Codes and Titles, January 2021.

² 86 FR 14463 (March 16, 2021)

³ 42 U.S.C. 247D-6, 300hh-1