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The mission of ADEA is to lead institutions and individuals in the dental education community to address contemporary issues influencing education, research and the delivery of oral health care for the overall health and safety of the public.

655 K Street, NW
Suite 800
Washington, DC 20001
Phone: 202.289.7201
Fax: 202.289.7204
adea.org

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:

The American Dental Education Association (ADEA) is the sole national organization representing academic dental education, including all 68 U.S. dental schools, more than 800 allied and advanced dental education programs, more than 50 corporations and approximately 18,000 individuals.

ADEA strongly supports the recommendations contained in the National Academies "Framework of Equitable Allocation of COVID-19 Vaccine," which include licensed dentists and dental hygienists and those who are also dental educators as among the first to receive the vaccine because of the risk posed by their necessary physical proximity to patients while providing care. Additionally, ADEA supports the Framework's recognition and inclusion of other members of the dental health care team—dental assistants, dental therapists and dental laboratory technicians.

It is equally important that this consideration be extended to dental, allied dental and advanced education students for the same reasons. Third- and fourth-year dental students spend the majority of their time providing direct patient care and must be included in the definition of "High-risk health workers," as should dental residents, most of whom are licensed dentists involved in specialty patient care. Additionally, ADEA supports the Framework's recognition and inclusion of other members of the dental health care team, such as dental assistants, dental therapists, and dental laboratory technician.

ADEA encourages you in the strongest possible terms to include each member of the oral health care team in Phase 1a of the national vaccination strategy. It is essential that practicing educator-clinicians, students and staff of academic dental clinics and hospitals receive the vaccine to protect them from the elevated risk they face as they provide essential oral health care to vulnerable and underserved populations, many of whom are not able to receive oral health care in other settings. This delivery of oral health services is important to the overall health and well-being of the dental workforce and to the patients for whom they care.

Thank you for considering our request and for your leadership in response to the COVID-19 crisis. If you have any questions, please feel free to get

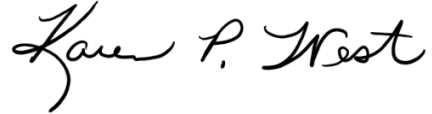
Advisory Committee on Immunization Practices

November 23, 2020

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in touch with me or with Tim Leeth, ADEA Chief Advocacy Officer, at leeth@adea.org or 202-236-5354.

Sincerely,

A handwritten signature in black ink that reads "Karen P. West". The signature is written in a cursive style with a large, looping initial 'K'.

Karen P. West, D.M.D., M.P.H.
President and CEO