

December 16, 2020

Robert R. Redfield, M.D.  
Director  
Centers for Disease Control and Prevention  
1600 Clifton Road NE  
Atlanta, GA 30329

Re: COVID-19 Vaccination Playbook for Jurisdictional Operations

Dear Dr. Redfield:

The undersigned organizations respectfully ask the Centers for Disease Control and Prevention (CDC) to clarify that dental, autopsy, and laboratory personnel are included in the Advisory Committee on Immunization Practices (ACIP) recommendation to give health care personnel priority access to a COVID-19 vaccine. The recommendation will eventually be reflected in CDC's COVID-19 Vaccination Playbook for Jurisdiction Operations.

The Advisory Committee on Immunization Practices (ACIP) recently recommended that vaccinations in the initial phase of the COVID-19 vaccination program (Phase 1a) should be offered to health care personnel and residents of long-term care facilities. The discussion at its meeting of December 1, 2020, suggests that ACIP intended for its definition of "health care personnel" to be broad and inclusive of all health care workers "who have the potential for direct or indirect exposure to patients or infectious materials."

For us, there is little question that ACIP intended for its recommendation to apply broadly to all health care workers. As a matter of due diligence, however, we would ask you to clarify that ACIP's recommendation includes dental, autopsy, and laboratory personnel.

ACIP's definition of "health care personnel" appears to be based, in part, on the term "healthcare personnel (HCP)" in CDC's 2019 Guideline for Infection Control in Healthcare Personnel (2019). The term is open to misinterpretation, however, because that particular infection control guideline states, "For this update, HCP does not include dental healthcare personnel, autopsy personnel, and laboratory personnel, as recommendations to address occupational infection prevention and control (IPC) services for these personnel are posted elsewhere."

We are convinced that ACIP did not intend to exclude *any* health care workers from its recommendation to offer vaccinations to health care personnel in the initial phase of the COVID-19 vaccination program (Phase 1a). However, we would hate for jurisdictions to overlook dental, autopsy, and laboratory personnel because of a minor footnote in guidance that was developed for an entirely different purpose (i.e., infection control).

Again, we respectfully ask CDC to clarify in its COVID-19 Vaccination Playbook for Jurisdiction Operations that all health care workers—including dental, autopsy, and laboratory personnel—are among those who should be given priority access to a vaccine during the initial phase of the COVID-19 vaccination program (Phase 1a).

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Thank you for considering our request. If you have any questions, please contact Mr. Robert J. Burns at the American Dental Association. Bob can be reached at 202-789-5176 or burns@ada.org.

Sincerely,

American Dental Association  
Academy of General Dentistry  
American Academy of Oral and Maxillofacial Pathology  
American Academy of Oral and Maxillofacial Radiology  
American Academy of Pediatric Dentistry  
American Academy of Periodontology  
American Association of Bioanalysts  
American Association for Clinical Chemistry  
American Association of Endodontists  
American Association of Oral and Maxillofacial Surgeons  
American Association of Orthodontists  
American Association of Women Dentists  
American College of Prosthodontists  
American Medical Technologists  
American Society for Clinical Laboratory Science  
American Society for Clinical Pathology  
American Society of Cytopathology  
American Society of Dentist Anesthesiologists  
American Student Dental Association  
Association of Pathology Chairs  
Hispanic Dental Association  
National Association of Dental Laboratories  
National Association of Medical Examiners  
National Independent Laboratory Association  
National Society for Histotechnology