

May 27, 2020

Dear Senators Rubio, Cardin, Collins, Shaheen and Durbin:

On behalf of our collective organizations, we would like to extend our gratitude and support for S. 3833, the Paycheck Protection Program Extension Act. This bill would provide flexibility for Paycheck Protection Program (PPP) loans, and our dental organizations believe this would be beneficial to our members who have already received these loans and for future borrowers.

According to the most recent data from the Health Policy Institute, only about 30% of dental practices have reopened and on average are seeing only 28% of the patients they were treating pre-pandemic.<sup>1</sup> Given the fact that most dental practices are small businesses, access to small business loan programs through the Small Business Administration (SBA) is a lifeline for our practice owners and their staff. Although many of our members have taken advantage of PPP loans, the lack of flexibility for these loans left many of our members uncertain about how to use the funds so that they could maintain their businesses, but still receive full loan forgiveness. Many of our members applied for and received funds before they were even able to open, due to state or local restrictions on non-emergency procedures.

As such, our collective organizations have asked both federal agencies and Congress to make changes to the PPP loan program. S. 3833 addresses many of these changes, particularly the provisions that provide additional time for the forgiveness period beyond the current 8 week limitation and allow borrowers to use PPP loan funds to purchase personal protective equipment (PPE). Enhanced PPE is particularly critical for dental offices due to the aerosols that are produced in oral health care procedures.

There are some additional provisions that our organizations would urge you to include either as amendments to S. 3833 or in future legislation. Primarily, we would support the addition of a tax credit or grant for businesses that received PPP loans early in the process and have made every effort to follow the rules—even without full guidance from the agencies—to achieve full loan forgiveness for their PPP loans. Many dental offices hired their employees back even before they were allowed to reopen in order to comply with the intent of the CARES Act and the PPP loan program. Those entities should be given additional compensation since they will likely not be able to take full advantage of the flexibility. Further, our organizations and other stakeholders will continue to advocate for allowing 501(c)(6)s to apply for PPP loans or other small business loan programs. This would provide state and local dental societies, as well as smaller dental specialty organizations, with access to critical additional funds.

Again, we thank you for introducing the Paycheck Protection Program Extension Act. We are supportive of the legislation and urge you to consider the additional flexibility we have highlighted in order to ensure that PPP loans provide the best possible support for non-profits, dental practices and all small businesses nationwide. If you have questions, please reach out to Megan Mortimer from the American Dental Association at [mortimerm@ada.org](mailto:mortimerm@ada.org).

Sincerely,

American Dental Association  
Academy of General Dentistry  
American Association of Endodontists  
American Academy of Dental Group Practice  
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 Oral and Maxillofacial Surgeons

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<sup>1</sup> [“COVID-19: Economic Impact on Dental Practices.”](#) Health Policy Institute. American Dental Association May 2020.

American Association for Dental Research  
American Association of Orthodontists  
American College of Prosthodontists  
American Society of Dentist Anesthesiologists  
American Student Dental Association  
National Dental Association