



**American Dental Assistants
Association**
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June 10, 2020

William Matarazzo
Industrial Hygienist/National Alliance Coordinator
Occupational Safety and Health Administration
Office of Outreach Services and Alliances
200 Constitution Ave, NW
Washington, D.C. 20210

Dear Mr. Matarazzo,

The American Dental Assistants Association (ADAA) is the professional organization representing dental assistants nationwide. Our membership has reached out expressing concern in regards to the letter sent by the Academy of General Dentistry (AGD) to the Occupational Safety Health Administration (OSHA) regarding "OSHA guidance to allow alternative Personal Protective Equipment (PPE) combinations based upon clinical judgment of the professional licensee in their jurisdiction of practice."

We are contacting you today in regard to recommendations made by the Academy of General Dentistry (AGD) in a letter dated June 4, 2020.

The purpose of the ADAA has always been to ensure the provision of quality care to patients including utilizing appropriate infection control and safety protocols, and to represent the interests and concerns of the Dental Assisting community.

These two purposes are especially important in light of the current pandemic due to COVID 19 and the current increase in cases following the lessening of restrictions in many states. It is critical that both education in and preparation for Infection Control and use of Personal Protective Equipment and Safety equipment be standardized rather than allowing for individual judgement.

Since the mission of OSHA is to insure safety at work and a healthful work environment, we would respectfully suggest that it would seem unwise to adopt the Academy of General Dentistry (AGD) recommendation contained in the letter written and presented to OSHA by

"The people who make dental assisting a profession!"

AGD dated June 4, 2020, which called for allowing an individual professional licensee to make these critical decisions for their staff.

We strongly believe there are not specific guidelines set forth to address the safety of clinical dental assistants while treating patients, especially during procedures that may have an increase of aerosols. In that case, it seems prudent to rely on requirements that represent the best thinking of the people in OSHA and the Centers for Disease Control and Prevention (CDC) who are focusing on this. The safety and health of all oral health care providers is of utmost importance to the ADAA, and we feel lessening restriction on PPE will not protect those dental assistants we represent. We would appreciate your consideration of our voice and opinion in this matter.

Sincerely,

/S/

Robynn Rixse, BS, CDA, EFDA, MADAA
ADAA President

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