

July 2, 2020

North Dakota Board of Dental Examiners
PO Box 7246
Bismarck, ND 58507

North Dakota Board of Dental Examiners,

On behalf of the North Dakota Dental Association members, we respectfully ask the North Dakota Board of Dental Examiners to publicly affirm that it is within the dentist's current scope of practice to conduct Food and Drug Administration (FDA) authorized point-of-care testing for the novel coronavirus (COVID-19). Point-of-care testing, with appropriate medical referrals when indicated, would greatly enhance dentists' ability to reduce the potential for exposure to COVID-19 of other patients and members of the dental team.

Currently, North Dakota dentists are following American Dental Association (ADA) and Centers for Disease Control (CDC) guidelines to prevent infection as dental offices reopen following our state's mandated shutdown of non-urgent dental care. During the acceleration phase of the pandemic, they performed only essential dental procedures for patients who would otherwise have sought care in hospital emergency departments. In this re-opening phase, dentists are now screening patients for signs and symptoms of COVID-19, and referring patients for appropriate medical follow-up. Unfortunately, such screening alone will not identify individuals who are infected but not displaying symptoms.

Dental personnel have a very high risk of exposure to COVID-19 because of their close proximity to patients' mouths and also because dental treatment commonly generates aerosolized particles.¹ Given that patients receiving dental treatment may be presymptomatic (i.e. infected but will develop symptoms in the next 14 days) or asymptomatic (i.e. infected but will never exhibit signs or symptoms of disease), it is critical to identify those individuals carrying the virus so that it is possible to minimize their contacting and potentially infecting others. Identifying presymptomatic and asymptomatic patients is key to being able to protect dental personnel and other patients from exposure. The CDC recommends that dental facilities consider implementing pre-procedure testing for COVID-19 especially in our current situation of PPE shortages in their interim guidance published June 17, 2020.

We urge you to publicly affirm that administering FDA-authorized point-of-care tests with FDA- emergency use authorization to screen for infection status is within the current scope of dental practice, with dentists appropriately referring patients for definitive diagnosis and treatment to a physician or medical facility. Doing so will better enable dentists to be valuable partners in potentially decreasing COVID-19 transmission in our state; will conserve the use of N95 masks for health care workers taking care of infected patients; and will provide greater assurance to the public that dental treatment is safe during the pandemic.

Thank you for considering our request. If you have any questions, contact William Sherwin or Dr. Brad Anderson, please see contact details below.

Sincerely,

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ⁱ U.S. Department of Labor, Occupational Safety and Health Administration, [COVID-19 Control and Prevention/ Dental Workers and Employees](#) (2020).