



March 21, 2020

The Honorable Eugene Scalia  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, D.C. 20210

Dear Secretary Scalia:

On behalf of the Ohio Dental Hygienists' Association (ODHA) and the state's dental hygienists, I want to thank you for your leadership in response to the novel coronavirus (COVID-19) pandemic and applaud you for your ongoing work to provide the American workers and economy with support and relief during these uncertain and unprecedented times.

Dental hygienists are licensed primary care oral health professionals and members of the oral health care team who focus on preventing, identifying and treating oral disease. Dental hygienists administer a range of oral health services including prophylaxis, sealants, fluoride treatments, oral health education, oral cancer screenings, and oral health education, among other services.

On March 18, 2020 the Centers for Medicare and Medicaid Services (CMS) issued recommendations on elective surgery and procedures; these recommendations are particularly strong with respect to dental procedures. Indeed, dental procedures are afforded particular emphasis. The CMS recommendations caution that: **"Dental procedures use PPE [personal protective equipment] and have one of the highest risks of transmission due to the proximity of the healthcare provider to the patient. To reduce the risk of spread and to preserve PPE, we are recommending that all nonessential dental exams and procedures be postponed until further notice."**

In Ohio, Governor DeWine and the Director of the Ohio Department of Health announced similar orders and immediately requested that dental practices adhere to these recommendations and close except to treat emergency cases; an action that ODHA believed was absolutely necessary. However, due to the implementation of the order, dental hygienists, many of whom work part-time in one or more practices, will not be working during the period these recommendations are in effect. Dental hygienists will need the employee benefits Congress and the President are providing to employees adversely impacted by the COVID-19 pandemic. We understand that there are efforts to allow

parttime employees to seek unemployment benefits, but it is dependent upon actions of the federal government.

**ODHA urges you to ensure through any means necessary that employees who are unable to work because they provide services that the government has recommended be “postponed until further notice” be compensated for the time they are unable to work. We do not support any efforts to eliminate the possibility of that relief, such as the blanket or individual exemptions for dental practices, from new paid leave requirements that organized dentistry is asking to be provided automatically to all dental practices employing fewer than 50 people.** An exemption provided to dental practices of this type would be catastrophic for our members and our families.

Thank you for your consideration of ODHA’s views and again for the important leadership role you are playing during this crisis.

Sincerely,

**Shannon Sweeney, RDH**

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President, Ohio Dental Hygienists’ Association