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August 31, 2021

Dear Governor Pritzker:

The Illinois State Dental Society (ISDS) has reviewed Executive Order (EO) 2021-20 and is seeking clarification as well as sharing concerns of dentists throughout Illinois. Many of our members have vocalized to us that a mandate is not necessary for our profession. Dentists have voluntarily and continually gone above and beyond to prevent the spread of infection since the onset of the pandemic. Unlike other industries, dentists utilize the highest standards for personal protective equipment on a daily basis. We have implemented additional infection control measures to ensure dentistry is being practiced safely<sup>1,2</sup>, trained over 1,000 dentists in the state to administer COVID-19 vaccinations, and serve as one of the highest vaccinated professions in the state.<sup>3</sup> Dentistry always rises to the occasion, even when not required by law.

If an EO mandating COVID-19 vaccines on dentistry continues to be in effect, additional clarification is being requested. While there are many questions, the most pertinent clarification at this time includes:

- EO 2021-20 and verbal comments from yourself and the Illinois Department of Public Health (IDPH) are conflicting. Clarity is needed regarding testing of health care workers who are not fully vaccinated.
- Will the State be providing employers standard forms for those with medical or religious exemptions, such as the one IDPH provides for required immunizations and/or examination exemptions for students?
- Which specific state agency, or agencies, will be enforcing this EO for dentistry?
- When will guidance be promulgated by the applicable state agency or agencies?

This EO comes in the midst of a national labor shortage, of which dentistry has not been exempt. The industry has suffered from an estimated 8% reduction in dental personnel who have left the workforce.<sup>4</sup> The majority of dentists are sole-proprietors and do not have experience enforcing a vaccine mandate on their staff as is enforced in other medical professions.<sup>5</sup> The obligations created by this Executive Order carry the probability of detracting the attention of dental team members away from providing clinical care, and worse, more health care workers leaving the profession. Replacing them would be even more difficult, because they are skilled workers and require training in proper healthcare protocols.

Dentistry is essential healthcare, and it is deeply concerning when the ability to provide such critical care is put in jeopardy. I cannot emphasize enough how much Illinois dentists are in favor of ending the COVID-19 pandemic through strongly encouraging dental professionals to be vaccinated. By allowing dentistry to prevent the spread of COVID-19 infection in the manner we have already implemented, we can both keep people safe and treat as many of our citizens as possible. In its current form, we believe that the EO will actually negatively impact the overall health of our citizens and cause an increase in unemployment. Please consider our concerns in our continued efforts to care for the health and welfare of our citizens.

Sincerely,

Alice G. Boghosian, DDS  
President

cc: Dr. Ngozi O. Ezike, Illinois Department of Public Health Director  
Dr. Mona Van Kanegan, Chief of the Division of Oral Health, Illinois Department of Public Health

#### Sources

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- 2 [https://jada.ada.org/article/S0002-8177\(21\)00204-X/fulltext?dgcid=PromoSpots\\_ADAorg\\_ADANews\\_JuneJADACOV](https://jada.ada.org/article/S0002-8177(21)00204-X/fulltext?dgcid=PromoSpots_ADAorg_ADANews_JuneJADACOV)
- 3 [http://www.ada.org/~media/CPS/Files/COVID/Tracking\\_COVID-19\\_Vaccination\\_Among\\_Dentists.pdf%204](http://www.ada.org/~media/CPS/Files/COVID/Tracking_COVID-19_Vaccination_Among_Dentists.pdf%204)
- 4 [https://www.adha.org/pri\\_docs/Feb-2021\\_JDH\\_EmployPatterns\\_DH\\_COVID.pdf](https://www.adha.org/pri_docs/Feb-2021_JDH_EmployPatterns_DH_COVID.pdf)
- 5 ADA Health Policy Institute analysis of Distribution of Dentists survey and Survey of Dental Graduates, January 2021