

August 12, 2021

Governor Jay Inslee
Office of the Governor
PO Box 40002
Olympia, WA 98504

Re: COVID-19 Vaccination Mandate

Sent via email only

Dear Governor Inslee:

On behalf of the Washington State Dental Association (WSDA) and our 4,500 members, we would like to express our concern with Proclamation 21-14's lack of a regular testing option and the unintended consequences it will have on the delivery of dental care in our state.

We respectfully request you implement an optional "vaccinate or test" policy for health care providers and workers, similar to what is being done in Oregon and California. We believe making this an option and even limiting it to small health provider groups that screen patients for COVID-19 symptoms is a reasonable and sound modification.

As you know, WSDA and our member dentists wholeheartedly support COVID-19 vaccination efforts and have been steadfast partners throughout the pandemic. Whether it was donating protective personal equipment (PPE) to hospitals at the beginning of the pandemic, volunteering to administer vaccines, penning editorials in newspapers throughout the state to encourage communities to get vaccinated, serving as a lead organization in PPE group purchase efforts for small health and long term care facilities, or participating in the Power of Providers Initiative, the dental community has done everything in its power to help protect the health and safety of Washingtonians during these unprecedented times.

Yet despite our partnership, we and other representatives of small health care facilities were not afforded the opportunity to provide feedback regarding Proclamation 21-14, leaving this important perspective out of the conversation entirely.

As a result, since this Proclamation was announced, we have been inundated with concerns from many of our members about how this mandate will cause their team members to quit. From dentists across the state, we heard of practices where 30% to 100% of the non-dentist staff have threatened to quit and seek other employment opportunities if required to receive a COVID-19 vaccine at this time. Five or six staff members opting against vaccination is orders of magnitude more significant for a small health care practice than it is for a larger system. And with dentists still making their way through backlogs of patients caused by the pandemic, this mandate will further delay patients from getting the care they need.

Compounding this issue is the fact that there is already an extreme labor shortage for dental auxiliaries across our state and our nation; replacing unvaccinated staff with vaccinated staff will be incredibly difficult, if not impossible for some providers. Before the pandemic, the statewide average of time a dental hygienist position is open was 4 months and 3 months for

a dental assistant. Now, with a mandate that does not provide health care workers with a regular testing option, positions will remain open even longer, leaving dentists struggling to fill them.

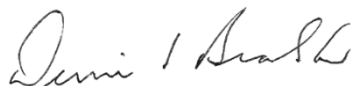
A mandate that applies a one-size-fits-all approach will only cause further, irreparable damage to the dental community that, for many, will serve as the final blow. Also, it is our understanding that an argument made against including a regular testing option in the Proclamation was the cost. We would argue that this cost is significantly smaller than filling vacant positions in an incredibly scarce hiring market.

In failing to consider the differences among different health care settings, this mandate also fails to recognize how COVID-19 transmission varies among different settings. U.S. dentists continue to have a lower infection rate than other health professionals, such as nurses and physicians. Based on the number of dentists with confirmed or probable COVID-19 infections over more than a 6-month timeframe, the cumulative infection rate for U.S. dentists is 2.6%, and, as of October 2020, the COVID-19 prevalence rate among dental hygienists is 3.1%.¹ Comparatively, the cumulative COVID-19 prevalence rate for other U.S. health professionals ranged from 3.3% to 35.3%.² WSDA would like to emphasize that these data on COVID-19 among U.S. dentists and hygienists stem from November and October 2020 respectively, prior to widespread COVID-19 vaccine availability.

As health care providers, our members continue to strongly support efforts to increase COVID-19 vaccination. However, WSDA cannot support a mandate that jeopardizes the sustainability of providing dental care in Washington state. As such, we implore you to consider the diverse needs of different health care settings and modify Proclamation 21-14.

Thank you in advance for your consideration of the above issues. If you would like any additional information, or if you have any questions, please do not hesitate to contact Bracken Killpack at bracken@wsda.org or 206-496-7572.

Sincerely,



Dr. Dennis Bradshaw
President
Washington State Dental Association



Mr. Bracken R. Killpack
Executive Director
Washington State Dental Association

c: Dr. Umair Shah, Secretary of Health
Molly Voris, Senior Policy Advisor for Public Health and Health Care
WSDA Board of Directors

¹ [https://jada.ada.org/article/S0002-8177\(21\)00204-X/fulltext](https://jada.ada.org/article/S0002-8177(21)00204-X/fulltext); https://www.adha.org/pri_docs/Feb-2021_JDH_COVID19_Prevalance.pdf

² <https://academic.oup.com/ofid/article/8/1/ofaa582/6015922?login=true>; <https://bmjopen.bmj.com/content/bmjopen/10/10/e042752.full.pdf>