



August 26, 2021

Governor Janet Mills
1 State House Station
Augusta, ME 04333

Re: COVID-19 Vaccination Mandate

Dear Governor Mills:

The Maine Dental Association (MDA) would like to share how the dental profession is working to protect employees and patients from COVID-19 while raising concerns with 10-144 Ch. 264. Based on new information gathered from the dental community, the Emergency Rule may have unintended consequences on the delivery of dental care to patients in Maine. To avoid this outcome, we recommend adjusting the mandate to incorporate an extended timeline for dental personnel compliance. Throughout the pandemic, the data show that COVID-19 infection simply has not occurred in dental offices, likely due to the diligence of the staff. We urge you to factor this outstanding track record into your re-consideration of the issue, and in so doing, maintain access to oral health care in Maine.

Based on research shared by the Maine Dental Hygienists' Association, approximately 33 percent of hygienists surveyed will "walk away from the profession if mandated to have vaccine." This research confirms what we have heard loudly from our members, that the Rule as currently drafted will cause a catastrophic workforce shortage in dental practices across the state.

Dental offices require adequate staffing levels to safely treat patients. Our members with smaller practices are anticipating losing nearly half their staff and several rural practices might have to close their doors permanently. Results of a membership survey conducted last week indicate that hundreds of dental auxiliary jobs will go unfilled, and that 15 practices could potentially close their doors. Without an extension in the Rule, thousands of Mainers might be left without a dental provider.

The majority of dental practices are small businesses and unlike other entities covered by the vaccine mandate, dental practices have not yet been subject to immunization tracking and reporting requirements. These are new types of requirements for our members and will take more time for all practices to start.

The MDA is in the process of developing an educational module based on tactics utilized by several Board members who have succeeded in reaching 100% COVID 19 vaccine compliance in their practices. We are further investigating strategies to assist our members in upholding the mandate while helping to ensure they do not lose existing staff such as:

- Tracking metrics – to determine why dental team members are or are not being vaccinated and how the numbers have changed since the mandate;
- Utilize American Dental Association COVID-19 Vaccine resources and having discussions with team members on vaccine safety to minimize concerns.
- Social media campaign to inform the narrative - produce easy-to-read, informational messages on where to get the vaccine, addressing safety concerns and dispelling vaccine myths, etc.

We continue to support the requirement that health care workers in Maine become vaccinated. It can be done in a way that avoids a negative impact on access to oral health care. We respectfully request an extension to January 1, 2022, in order to assist members in efforts to achieve compliance and further to assist them in developing and implementing systems to fulfill the medical reporting requirements of the Rule. Should you have any questions, please don't hesitate to contact Kathy Ridley, MDA Interim Executive Director at 207-622-7900 or by email at kridley@medental.org. Thank you for your consideration.

Sincerely,



Heather Keeling, DDS
President, MDA



Kathleen Ridley, CAE
Interim Executive Director, MDA

cc: Bethany Beausang, Senior Policy Advisor
Dr. Nirav Shah, Maine CDC
Jeanne Lambrew, Commissioner, Maine Department of Health and Human Services