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April 28, 2020

Pete T. Gaynor, Administrator  
Federal Emergency Management Agency  
Via email: [peter.gaynor@fema.dhs.gov](mailto:peter.gaynor@fema.dhs.gov)

Re: Personal Protective Equipment (“PPE”) for Orthodontists and  
Orthodontic Staff

Dear Administrator Gaynor:

I am writing to you regarding the need for PPE for orthodontists and their staff in their practices, and FEMA’s potential role in assisting to provide that PPE. By way of background, I am President of the American Association of Orthodontists (“AAO”), a nonprofit professional association of nearly 19,000 orthodontists practicing in the United States as well as abroad. The AAO’s mission and goals include improving the health of the public by promoting quality orthodontic care, the importance of overall oral healthcare, and advocating for the public interest.

As an initial matter, I want to thank you for FEMA’s role in leading our nation’s response to the pandemic during this difficult time. The AAO has consistently recommended that our members follow the guidance and restrictions of our federal, state and local governmental bodies and agencies. FEMA has played an important role in the federal government’s response to this pandemic, and we thank you for your leadership in that role.

On April 22, 2020, one of our trustees, Dr. Michael Durbin, and the incoming chair of our Council on Orthodontic Practice, Dr. Lara Minahan, participated in a call organized by the National Manufacturer’s Association discussing the need for PPE in various industries and professions. One of FEMA’s staff members, Cdr. Richie Jenkins, a member of FEMA’s Supply Chain Management Team, also participated in the call. The general topic of the call was priority of supplying PPE to the different industries and professions.

During that call, Cdr. Jenkins expressed that FEMA’s first priority for supplying PPE was “first line” COVID-19 workers, such as medical

professionals treating those patients, first responders, and nursing home employees. The AAO, of course, supports this priority and would not want to support any action that takes away needed PPE from these first line workers.

However, we anticipate that in the coming weeks PPE supplies in the United States will increase such that orthodontic practices and other users of PPE, besides first line workers, will be able to access PPE. On the other hand, we also anticipate that the demand for PPE will be enormous in comparison to pre-COVID-19 demand, as numerous other industries and professions look to utilize PPE in order to reopen, including many that may not have needed forms of PPE like N95 masks or face shields in the past.

One of the topics of the April 22 call was prioritization of PPE among the various industries as supplies increase. For that reason, I am writing to request, on behalf of the AAO and its U.S. members, that FEMA give priority to orthodontists and orthodontic practices in supply of PPE to non-first line workers.

As you are likely aware, orthodontic patients who are in active treatment need to be seen periodically by their orthodontist in order to avoid harm to the patient. While the exact amount of time that a patient can go between in-person examinations by his or her orthodontist can vary depending on the specific treatment being utilized,<sup>1</sup> in general no orthodontic patient can go indefinitely without being seen by the orthodontist. At some point in time (the specific time period depending on factors unique to each patient), every orthodontic patient in active treatment needs to be seen by his or her orthodontist.

Orthodontics involves placing forces on the teeth to move them through the jawbone. These forces are continuous and must be regularly monitored and modified to prevent moving the teeth too far, in the wrong direction, or out of the bony sub-structure. Left unchecked or unmodified, these forces have high potential to cause tooth loss, gum damage, bite trauma, jaw discomfort, and adverse oral hygiene situations. Therefore, orthodontists must see patients at regular prescribed intervals for adjustments to these forces in order to mitigate the risk of irreversible damage to a person's bite and smile.

Because of these concerns, our members are anxious to begin seeing their patients again. The vast majority of our members have closed their practices during this period (other than seeing emergency patients) in accordance with federal, state and local guidance. In order to begin seeing patients, however, our members will need to obtain PPE in order to comply with clinical recommendations by the Centers for Disease Control as well as the American Dental Association.

<sup>1</sup> For example, there are some "active" treatment appliances in orthodontic practice that, if not closely monitored and regularly adjusted by the practitioner, could progress too far and result in harm to the patient. These appliances include coil springs, certain power chains and certain types of archwires. These patients in particular must be seen regularly to ensure that otherwise helpful treatment does not progress further than desired and result in harm to the patient.

Therefore, for these reasons, and in the interest of protecting our patients' health and safety, I am writing to request that FEMA give priority to orthodontists and orthodontic practices as your agency prioritizes the supply of PPE to non-first line workers and industries. Thank you in advance for your consideration of the concerns discussed herein. Please do not hesitate to contact me should you have any questions regarding these issues, or if the AAO can be of assistance to FEMA in providing information or other resources related to these issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary O. Inman". The signature is fluid and cursive, with a large initial "G" and "I".

Dr. Gary O. Inman  
President, American Association of Orthodontists

c: [eric.heighberger@fema.dhs.gov](mailto:eric.heighberger@fema.dhs.gov)