

Dentists Administering COVID-19 Vaccinations

Executive Summary

Governor Cooper's Executive Order #193 in conjunction with recently enacted Administrative Orders from the Secretary of the Department of Health and Human Services (DHHS), the State Health Director, and the NC State Board of Dental Examiners now allow dentists to administer COVID-19 vaccinations in North Carolina. Full provisions of all orders regarding individual training and education, handling and administration of the vaccine, and patient education and follow-up are continually and contemporaneously in effect.

The Dental Board's Order requires dentists to do the following:

1. Prior to administering any FDA-authorized COVID-19 vaccine, a dentist licensed in North Carolina shall successfully complete the COVID-19 training programs available through the Centers for Disease Control and Prevention available at <https://www.cdc.gov/coronavirus/2019-ncov/hcp/training.html>, including:
 - a. "COVID-19 Vaccine Training: General Overview of Immunization Best Practices for Healthcare Providers".
 - b. "What Every Clinician Should Know about COVID-19 Vaccine Safety";
 - c. "COVID-19 Vaccines: General Information and Clinical Guidance Update";
 - d. "COVID-19 Vaccines: Update on Allergic Reactions, Contraindications, and Precautions".
 - e. "What Clinicians Need to Know About the Pfizer-BioNTech and Moderna COVID-19 Vaccines," should be completed before administering either of these vaccines;
 - f. "Pfizer-BioNTech COVID-19 Vaccine: What Healthcare Professionals Need to Know," should be completed before administering this vaccine;
 - g. "Moderna COVID-19 Vaccine: What Healthcare Professionals Need to Know," should be completed before administering this vaccine; and
 - h. Training for any other FDA-authorized or approved COVID-19 vaccine(s), should be completed before administering any such vaccine(s).
2. The dentist administers any COVID-19 vaccine in accordance with any applicable FDA emergency use authorization.
3. Vaccinating dentist must comply with all applicable federal and state provider enrollment, data entry, and reporting requirements as part of COVID-19 vaccination, <https://www.cdc.gov/vaccines/covid-19/vaccination-provider-support.html>.

4. The dentist maintains a record of compliance with the above applicable requirements and provide any such record to the Board upon its request.
5. If administering the vaccine pursuant to a statewide standing order issued by the State Health Director, the dentist must comply with all requirements and conditions in the Standing Order, including having a medical provider accessible to provide medical supervision of the vaccination site or service, which may be telephone or virtual accessibility. <https://files.nc.gov/covid/documents/guidance/vaccinations/Statewide-COVID-19-Vaccine-Standing-Order.pdf>
6. A dentist that administers or provides a COVID-19 vaccination in compliance with the requirements in this Order would not be considering to be practicing outside the scope of dentistry nor in violation of N.C. Gen. Stat. Chapter 90, Article 1, N.C. Gen. Stat. §§ 90-29, 90-41(a)(26) or 21 NCAC 16 V. .0101(27).

It is important to note that paragraph #5 above in the Board's Standing Order incorporates by reference the Standing Order of the State Health Director. The Director's Standing Order applies to all vaccinators and sites where the vaccine is offered and requires all such sites to have a "medical provider" accessible on-site, by telephone, or virtually to answer medical questions. [See p.2 "Actions" Section 2(c)] This means that while dentists who comply with all education and training requirements may administer the vaccine independently, they must have a medical provider available by telephone or virtually to answer medical questions.

Keep in mind that the Governor's Executive Order #193 and the Secretary's Order #8 are set to expire on May 10, 2021 unless suspended or replaced. Dentists' ability to administer the COVID-19 vaccine is contingent on these Orders remaining in place and could end on that date. However, the Orders may also be extended beyond May 10, 2021. It is far too early to determine if that will be the case, so please check the Board's website [www.ncdentalboard.org] or other news sources for the latest information.