



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

NOTICE OF ADOPTION OF AN INTERPRETIVE STATEMENT

Title of Interpretive Statement: Novel coronavirus disease 2019 (COVID-19) vaccine ordering and administration | Policy number: DQAC IS-02

Issuing Entity: Dental Quality Assurance Commission

Subject Matter: The ordering and administration of the coronavirus disease 2019 (COVID-19) vaccination can be within the scope of practice of a dentist licensed under chapter 18.32 RCW when the treating dentist has appropriate, verifiable training and experience that includes a hands-on component.

Effective Date: January 7, 2021

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**Department of Health
Office of Health Professions
Dental Quality Assurance Commission**

Interpretive Statement

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Title:	Novel coronavirus disease 2019 (COVID-19) vaccine ordering and administration	Number: DQAC IS-02
References:	RCW 18.32.020	
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The ordering and administration of the coronavirus disease 2019 (COVID-19) vaccination can be within the scope of practice of a dentist licensed under chapter [18.32 RCW](#) when the treating dentist has appropriate, verifiable training and experience that includes a hands-on component.

The ordering and administration of influenza and non-COVID-19 vaccinations is not included in this interpretation. The intent is to help boost capacity for priority populations who may not otherwise be connected to traditional health care systems during the pandemic.

Background and Analysis

Definitions

Dentist: A dentist licensed in the state of Washington under chapter 18.32 RCW who does not have the requisite training to represent himself or herself as an oral/maxillofacial surgeon.

Novel coronavirus disease 2019 or COVID-19: a mild to severe respiratory illness caused by a [coronavirus](#) (Severe acute respiratory syndrome coronavirus 2 of the genus Betacoronavirus), is transmitted chiefly by contact with infectious material (such as respiratory droplets) or with objects or surfaces contaminated by the causative virus, and is characterized especially by fever, cough, and shortness of breath and may progress to pneumonia and respiratory failure.

Vaccine or Vaccination: a substance used to stimulate the production of antibodies and provide immunity against one or several diseases, prepared from the causative agent of a disease, its products, or a synthetic substitute, treated to act as an antigen without inducing the disease.

Description of Issue

Are COVID-19 vaccine injections within the scope of practice for dentistry?

Analysis

RCW 18.32.020 defines dentistry:

“A person practices dentistry, within the meaning of this chapter, who (1) represents himself or herself as being able to diagnose, treat, remove stains and concretions from teeth, operate or prescribe for any disease, pain, injury, deficiency, deformity, or physical condition of the human teeth, alveolar process, gums, or jaw, or (2) offers or undertakes by any means or methods to diagnose, treat, remove stains or concretions from teeth, operate or prescribe for any disease, pain, injury, deficiency, deformity, or physical condition of the same, or take impressions of the teeth or jaw, or (3) owns, maintains, or operates an office for the practice of dentistry, or (4) engages in any of the practices included in the curricula of recognized and approved dental schools or colleges, or (5) professes to the public by any method to furnish, supply, construct, reproduce, or repair any prosthetic denture, bridge, appliance, or other structure to be worn in the human mouth...”

[RCW 18.32.020\(4\)](#) allows for practices included in the curricula of “recognized and approved dental schools or colleges.” University of Washington, School of Dentistry and Oregon Health Sciences University, School of Dentistry include vaccination education in their dental curriculum. Other dental schools across the nation are also incorporating vaccination education in their curriculums.

In response to the COVID-19 pandemic, disease vaccination is essential. Dentists are essential health providers who can safely administer these vaccines and help address this public health emergency. For example, licensed dentists routinely:

- Perform surgery;
- Handle medical emergencies; and
- Administer injections that are more technically complex and medically risky than vaccines.

Dental education and training include:

- Applying biomedical science knowledge in the delivery of patient care;
- Recognizing complexity of patient treatment and identifying when referral is indicated;
- Health promotion and disease prevention;
- Prescribing and administering pharmacological agents;
- Administering anesthesia and pain/anxiety control;
- Managing dental and medical emergencies; and
- Assessing and managing the treatment of patients with complex medical conditions.

Given the standard training and experience of dentists, ordering and administration of COVID-19 vaccination can be within the scope of practice of a dentist licensed under chapter [18.32 RCW](#) when the treating dentist has appropriate, verifiable training and experience that includes a hands-on component.

The ordering and administration of influenza and non-COVID-19 vaccinations is not included in this interpretation. The intent is to help boost capacity for priority populations who may not otherwise be connected to traditional health care systems during the pandemic.

Licensed dentists should ensure the following when ordering and administering COVID-19 vaccinations:

- Complete appropriate education and training to administer vaccines;
- Complete the Centers for Disease and Prevention Control vaccine online training;
- Comply with the Washington State COVID-19 Vaccination Plan;
- Prior to administering a vaccine, review the patient's vaccination history in the immunization registry;
- Ensure patient communication for informed consent;
- Ensure safe transportation and storage, including special refrigeration needs, if any;
- Consider rare adverse effects, recognition and referral;
- Report for adverse effects;
- Consider special components of medical history;
- Ensure communication with public health department regarding vaccination records;
- Comply with notification protocols for 2nd, potentially 3rd doses;
- Maintain vaccine inventory and safe disposal of unused inventory;
- Communicate and consider common side effects and management and/or referral; and
- Comply with all federal and state reporting requirements.

COVID-19 vaccination training resources:

- Centers for Disease and Prevention Center [training](#)
- Department of Health [training](#)
- Contact the University of Washington for their training when available.
- Oregon Health Science University [training](#)