

Dear Secretary Mnuchin and Administrator Carranza:

On behalf of our collective organizations, we are writing to request flexibility for Paycheck Protection Program (PPP) loans regarding costs related to personal protective equipment (PPE). Our organizations were relieved that Congress provided additional funding to PPP and other critical loan programs, but small business health care providers, especially those in dentistry, are going to require significant increases in PPE in order to protect themselves, their employees and their patients from COVID-19 infections. Given the nature of oral health care treatments and procedures, the exposure to this virus through aerosol generating procedures and droplets in the air is especially concerning for dental offices.

Many of our members have begun to receive their loan funds and are beginning to make decisions on what non-payroll costs they will use these funds for in order to receive full loan forgiveness. It is clear that access to PPE is of primary concern, but the cost of more robust and additional PPE is also causing many of our members to believe that this will have a considerable economic impact on their businesses. At this time, we are asking that the non-payroll costs that are allowable for PPP be expanded to include the cost of PPE. Further, a borrower that uses PPP funds for PPE—so long as it stays within the threshold for non-payroll-related costs—should not be prevented from receiving full forgiveness of these loans.

We understand that the intent of PPP was to encourage small businesses to retain or rehire their staff in a timely manner. However, both dentists and their employees are concerned about their health and safety, especially due to the fact that they are particularly vulnerable. It is important to reopen dental practices and provide dentists and their employees with the wages and benefits they need, but we cannot do so without first ensuring their health and safety as well. Allowing this flexibility for PPP loan proceeds will help to mitigate the increased costs of the PPE that will be required in order to provide care to our patients and protect ourselves and our employees.

We believe that this flexibility could be done through agency action and be included in future guidance from the Department of the Treasury and the Small Business Administration. However if congressional action is required, we are asking that this change be included in the next COVID-19 relief package.

On behalf of our collective organizations, we would like to thank you for recognizing the need for small businesses, including dental practices, to receive financial support during these difficult times. Dental offices are eager to reopen to treat their patients and rehire their employees, but patients, providers and employees need to feel safe to return. PPP loan fund flexibility is a simple way to help address this. If you have further questions, please reach out to Megan Mortimer at the American Dental Association, mortimerm@ada.org.

Thank you for considering this request.

Sincerely,

American Dental Association
Academy of General Dentistry
American Association of Oral and Maxillofacial Surgeons
American Academy of Pediatric Dentistry
American Academy of Oral and Maxillofacial Pathology

American Academy of Oral and Maxillofacial Radiology
American Academy of Dental Group Practice
American Academy of Periodontology
American Association for Dental Research
American Association of Endodontists
American Association of Orthodontics
American Association of Women Dentists
American College of Prosthodontists
American Dental Education Association
American Student Dental Association
National Dental Association