



U.S. Department of Justice
Federal Bureau of Prisons

Washington, D.C. 20534

MEMORANDUM FOR ALL DENTAL HEALTHCARE PERSONNEL

Michael Windsor Johnson
FROM: CAPT Michael Windsor Johnson, D.D.S., M.P.H.
National Chief Dentist

Sylvie I. Cohen
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Chief, Occupational Safety & Health Branch
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Date: 2020.08.21 18:11:15 -04'00'
Jeffery D. Allen, M.D., Medical Director

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Date: 2020.08.21 13:46:09 -04'00'
Tushar Patel, Chief, Office of Quality Management

SUBJECT: Dental Staff performing COVID-19 Diagnostic Testing

The Office of the National Chief Dentist sought a legal opinion regarding dental professionals performing COVID-19 testing. The Office of General Counsel concluded that the Federal Bureau of Prisons COVID-19 response mission supersedes any state dental licensing and dental practice acts which may not permit COVID-19 testing by dental healthcare personnel (i.e. dentist, dental hygienist and dental assistant).

The Dental Health Care Personnel (DHCP) administering COVID-19 diagnostic tests are now a part of the scope of the BOP dental practice and they can be assigned to administer COVID-19 testing. Those DHCP will need to have documentation as evidence of receiving training and skills to administer the testing. This memorandum and the training and skills documentation should be included in the DHCP's credential folder at the institution and will serve as an addendum to their previously signed privileges, practice agreement or protocols in respected cases.

Should you have any questions or concerns, please feel free to contact your Regional Chief Dentist.

cc: Regional Health Services Administrators
Regional Quality Improvement Consultants
Regional Chief Dentists
Regional Medical Directors