Who’s in charge? The ‘chain of command’ for dental guidance

As dentists made their way through the COVID-19 pandemic, many found the varying guidance from state and local authorities to be confusing. The following chart breaks down the roles of each of the organizations involved:

Federal Agency

Center for Disease Control and Prevention
The nation’s health protection agency and provides guidance on infection control protocols and the proper use of PPE.

State and Local Agencies

The Governor
Guides the state on when and how to modify the stay-at-home ordinance as well as other orders during the COVID-19 pandemic.

The Division of Occupational Safety and Health
Cal/OSHA regulates workplace safety and offers recommendations on how to protect workers from COVID-19 and prevent the spread of the disease.

California Department of Public Health
Takes recommendations from the governor and other regulatory agencies such as Cal/OSHA and CDC to create and issue guidance that practice owners are encouraged to comply with.

Dental Board of California
Uses guidance from CDC, OSHA and other government agencies to establish regulations that are enforceable by law. The board also oversees infection control and enforces the obligation of dentists to provide a safe environment for staff and patients.

County and City Public Health Offices
Receive guidance and recommendations from CDPH for local regulations. If a local ordinance is more stringent than state regulations, the local ordinance should be followed.

American Dental Association
Provides guidance to state dental associations and dental professionals across the country based on current laws and regulations. ADA is not a regulatory body and cannot issue mandates on dental practice operations.

California Dental Association
Informs California dental professionals of current laws and regulations and offers recommendations on what would be beneficial to practice owners, their teams and patients. CDA is not a regulatory body and cannot issue mandates on dental practice operations.

Local Dental Societies
Offer recommendations based on guidance to ensure each sector of dental professionals are compliant with local, state and federal regulations. Local societies are not regulatory bodies and cannot issue mandates on dental practice operations.
**General order of precedence:** Federal, state, local; however, in most cases related to COVID-19 orders and mandates, the most restrictive will apply. For example, if a county has a more restrictive order or mandate than the state, the county order will apply.

**Statutes/regulations:** Unless deemed inapplicable by a federal or state executive order, existing statutes and regulations remain in effect. During a declared emergency, government agencies can issue interim regulations, sometimes called “interim rules”.

**Orders/Mandates:** May be enforced by law enforcement and generally must be complied with.

**Directive:** Similar to an order, but it depends on the specific language of the directive as to whether it’s enforceable in the same manner as an order or mandate.

**Guidance/Guidelines:** May be issued by government agencies, such as CDC, CDPH and Cal/OSHA and should be followed, but not enforceable in the same manner as an order or mandate.