

Madame Chair Monnes Anderson and the Committee;

Thank you for allowing me to submit testimony for SB 673, on behalf of the Oregon Board of Dentistry. The Board of Dentistry, in keeping with its regulatory role in regards to dentists and hygienists does not oppose the bill. The Board does have some questions about implementation and training and feel these are necessary areas that need to be explored or answered in terms of protection of the public. The Board has reviewed the legislation and understands it would go into effect Jan 2016.

Potential issues the Board has regarding this bill;

1. Are dentists trained in dental school for contraindications; bad reactions for a patient? Or will it be up to the Board to establish rules regarding this?
2. Who will assure dentists utilize correct storage of the immunization medicines; receive some training? Up to rules?
3. Do some injection sites involve areas other than arm? If so, do dentists have adequate training?
4. Does dental malpractice insurance cover this?
5. Will dentists be required to have specific written informed consent forms for immunizations only?
6. Will dentists be able to bill insurance for reimbursement; do they have training and ability to do so?
7. How do dentists get trained on the Immunization Registry?
8. Will these immunizations include those for pre-school age children?

We reviewed Pharmacies Rules regarding this as well.

### **Administration of Vaccines by Pharmacists**

#### **855-019-0270**

#### **Qualifications**

- (1) In this rule and in OAR 855-019-0280, an intern who is appropriately trained and qualified in accordance with Section (3) of this rule may perform the same duties as a pharmacist, provided that the intern is supervised by an appropriately trained and qualified pharmacist.
- (2) A pharmacist may administer vaccines to persons who are at least 11 years of age as provided by these rules. For the purposes of this rule, a person is at least 11 years of age on the day of the person's eleventh birthday.
- (3) A pharmacist may administer vaccines under section (1) or section (2) of this rule only if:
  - (a) The pharmacist has completed a course of training approved by the Board;
  - (b) The pharmacist holds a current basic Cardiopulmonary Resuscitation (CPR) certification issued by the American Heart Association or the American Red Cross or any other equivalent program that contains a hands-on training component and is valid for not more than three years, and documentation of the certification is placed on file in the pharmacy;
  - (c) The vaccines are administered in accordance with an administration protocol written and approved by the Oregon Health Authority (OHA); and
  - (d) The pharmacist has a current copy of the CDC reference, "Epidemiology and Prevention of Vaccine-Preventable Diseases."
- (4) A pharmacist otherwise in compliance with section three of this rule may, during a declared emergency, administer a vaccine to a person who is at least three (3) years of age when;
  - (a) The Governor declares a state of public health emergency and authorizes the reduced age limitation;or
  - (b) The Public Health Director, during a declared disease outbreak, authorizes a reduction in the age limit.
- (5) A pharmacist may not delegate the administration of vaccines to another person.

Stat. Auth.: ORS 689.205 433.441, 433.443 & 2013 OL Ch 332

Stats. Implemented: ORS 689.151, 689.155, 689.645 & 2013 OL Ch 332

Hist.: BP 7-2000, f. & cert. ef. 6-29-00; BP 3-2006, f. & cert. ef. 6-9-06; BP 1-2007, f. & cert. ef. 6-29-07;  
Renumbered from 855-041-0500, BP 2-2008, f. & cert. ef. 2-20-08; BP 11-2010, f. 10-22-10, cert. ef. 1-1-11; BP 2-2014, f. & cert. ef. 1-24-14

The Board is happy to discuss these issues further or happy to meet with anyone else regarding this issues.

Thank you for your consideration.

Sincerely,  
Stephen

*Stephen Prisby*

Interim Executive Director

Oregon Board of Dentistry

1500 SW 1st Ave., Suite #770

Portland, Or 97201

p 971-673-3200

f 971-673-3202

[www.Oregon.gov/Dentistry](http://www.Oregon.gov/Dentistry)