

March 3, 2021
Re: House Bill 2528

House Committee on Health Care
900 Court Street NE
Salem, Oregon, 97301

Subject: Significant Concern with HB 2528
Chair Prusak, Vice-Chairs Hayden and Salinas,

My name is Jennifer O'Connor and I am a general dentist practicing in Tigard and Woodburn, who treats patients of all backgrounds and income levels. I am writing to you to express my concern with the House Bill 2528, and new legislature concerning dental therapists. I have trained and worked with restorative dental hygienists in the past, and I have seen the benefits of having a 'mid-level-provider' to help accomplish tasks in a busy office. The restorative hygienists I have worked with have had countless hours of training, and have worked closely with me, as the guiding dentist, to ensure that all standards of care are being met in practice. I feel that the new House Bill 2528 fails to meet the standard of care in many aspects. The inconsistency with training requirements, means that a high school graduate, with as little as 70 hours of training, would be able to perform dental procedures far outside their scope. With little or no supervision directly from a trained dentist, irreversible procedures would be performed without accountability. Dentists are required to attend four years of graduate school, pass rigorous testing, and spend countless hours in the lab and clinic prior to performing surgical and permanent dental procedures on patients independently. HB 2528 would allow any dental therapist to perform these same tasks without the proper training or guidance. Before something like this is passed, I think it is important to rethink the scope of practice for dental therapists. This bill would need to limit a dental therapists abilities and the procedures they are permitted to do independently. This bill should set a standard for school and requirements prior to sending dental therapists out to practice on their own. If Oregon is trying to expand care to those who live in rural communities, or those without a dental home, who's access to care is limited, we should continue to work toward a solution. However, providing treatment that is far below the standard of care, is not what these patients deserve. I hope we can continue to work toward a solution that keeps our patients' safety our highest priority. Please do not move this bill out of committee without substantial revisions.

Sincerely,

Dr. Jennifer L. O'Connor
Portland, Oregon