

March 3, 2021

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 Alayna Schoblaske. I practice as a general dentist practicing at a Federally Qualified Health Center in Medford, Oregon. Over half of our clinic's patients rely on the Oregon Health Plan (an additional quarter are uninsured), over three-quarters live at or below 200% of the Federal Poverty Level, and nearly one-third identify as Latino/a/x. I care deeply about my patients, and believe that each person I serve is precious, deserving dignity and excellence.

It is from that place that I am writing to express my concern with House Bill 2528. I am not opposed to Dental Therapists. However, I fear that the bill in its current form would compromise the dignity and excellence that my patients deserve.

I am most concerned about the educational requirements and scope outlined in the bill.

The educational requirements for Dental Therapists as currently outlined in HB 2528 do not align with the Commission on Dental Accreditation (CODA) standards for a dental therapy curriculum. All other dental providers in Oregon – dentists and dental hygienists – are required to complete a CODA-accredited program, and it is important for Dental Therapists to be held to the same standard. CODA accreditation is an extensive process; I was a dental student during OHSU's last round of accreditation and saw first-hand the attention to detail and dedicated preparation that was required for re-accreditation. The extensive nature of the process, though, ensures that graduates from *all* accredited programs are adequately prepared to provide the standard of care for their patients upon graduation. This preparation is owed to patients being treated by Dental Therapists, too.

The bill as proposed allows for Dental Therapists to perform treatment under general supervision, which means that a supervising dentist could be in a different building or even a different city during treatment. I practice in a large clinic with nine other dentists, and I am very serious when I say that I would never personally choose to practice alone. I trust my skills and critical thinking ability. Nevertheless, there have been a couple of times where I have run into unforeseen treatment complications and have been profoundly grateful for the support and aide of my dentist colleagues. Allowing Dental Therapists to practice under general supervision –

possibly as the only provider in their clinic – is placing patients at increased risk of harm, and placing Dental Therapists at increased risk of anxiety and burnout.

Finally, on a more personal note, I wonder if the very broad strokes of HB 2528 will meet the unique needs of Oregon's dental patients. I grew up in Oregon, and I deeply love this state. I believe Oregonians are innovative, and we prioritize the equity of each Oregonian. HB 2528 is a haphazard amalgamation of different dental therapy legislation from around the country and does not account for Oregon's geography, assets, and needs. I believe we can collaborate to create dental therapy legislation that is innovative, exciting, and intentionally addresses the unique oral health disparities and dental access issues we want so earnestly to solve.

Congress' job is to create legislation that best prepares Dental Therapists to successfully serve patients. Without changes to the bill, I do not believe you have achieved this goal with HB 2528. I fear that, instead, we will create a two-tiered dental care system in Oregon where traditionally underserved patients' inequities are further amplified by undertrained and under-supported Dental Therapists.

I hope that the Health Care Committee and Congress will work together with those underserved communities, with dental professionals, with community health centers, and with more to ensure that our version of dental therapy prioritizes patient safety, and truly solves Oregon's unique dental access issues. Please do not move this bill out of committee until this happens.

Sincerely,

Alayna Schoblaske, DMD
Medford, Oregon