



Senate Committee on Health Care  
900 Court St. NE  
Salem, OR 97301

Subject: Concerns with House Bill 2528

Dear Members of the Senate Committee on Health Care,

On behalf of the 81 members of the Oregon Society of Oral and Maxillofacial Surgeons (OSOMS), we would like to thank you for the opportunity to provide comment on HB 2528, which seeks to establish dental therapists in the state. OSOMS is in favor of improving access to dental care – including oral surgery – but has continued concerns with HB 2528.

OSOMS has been encouraged by the amendments to the initial version of HB 2528. Issues pertaining to educational requirements, scope of practice, and supervision – areas on which we previously shared concerns – have been addressed in part. We do believe there are additional changes needed, primarily related to the allowable scope of practice, in order to optimize the safety and well-being of our patients.

The procedures allowed under the bill include multiple irreversible procedures, which are to be performed without direct supervision and may conceivably result in long term complications. The scope of practice of dental therapists as provided in HB 2528 includes “simple extractions of erupted primary teeth” and “simple extractions of periodontally diseased permanent teeth with advanced mobility.” Secondary to individual anatomic variations, existing dental pathology, and patient comorbidities very few extractions could be accurately described as “simple.” What may appear to be “simple” may indeed be quite complex, resulting in postoperative complications following what looked to be a preoperatively routine procedure. Recognition of these challenges and their prompt and appropriate treatment is of paramount importance in averting negative outcomes. Achieving positive outcomes with the greatest frequency possible requires advanced training and education. Such training and education can only be accomplished through attaining the appropriate doctoral degree.

HB 2528 also includes “emergency palliative treatment of dental pain” among the allowable procedures. This item is ambiguous and overly permissive, apparently allowing treatments from outside the listed acceptable procedures into a territory without restriction. Other states have addressed this by including wording allowing emergency palliative treatment but limiting the scope to those items otherwise included in the dental therapist scope.

HB 2528 also contains other procedures which may cause significant pain and irreversible harm. This includes pulp capping, direct restorations, and tooth reimplantation. Providing these services and those referred to above, while critical, cannot be accomplished at the expense of substantial irreparable emotional and physical injury to our patients. We must work to minimize potential trauma by ensuring these invasive procedures are performed with the highest level of expertise, enhancing efficiency and reducing patient fear and anxiety.

OSOMS would hope that we are striving to raise the level of care in our diverse and economically disparate communities, and ensuring more complex procedures result in the best outcome with the least amount of detriment. This could optimally be accomplished by pursuing methods to promote and sustain individuals from these communities in their efforts to become dentists and dental specialists. In doing so, we can nurture improved access and advance the level of care in these populations.

We would like to thank you for working to improve the provision of dental care in Oregon. OSOMS would encourage the Senate Committee on Health Care to not move this bill out of committee without substantial revisions to ensure patient safety. We would also ask that future efforts in this arena include insight from the dental community, including oral and maxillofacial surgeons. We stand ready and willing to assist in this process and relish the opportunity to work together to facilitate improved access and quality of care to the people of Oregon. For more information or questions, please contact Mrs. Lora Mattsen, Executive Director of OSOMS, at 503-594-0322 or [oregonoms@gmail.com](mailto:oregonoms@gmail.com) for questions or additional information.

Respectfully,

A handwritten signature in black ink, appearing to read 'TA', followed by a horizontal line extending to the right.

Thomas A. Kolodge, DDS, MD  
OSOMS President