

05/13/2021  
Senate Committee on Health Care  
900 Court Street NE  
Salem, Oregon, 97301

Dear Members of the Senate Health Care Committee,

Thank you for the opportunity to provide comment on HB 2528. I am a general dentist practicing in Yamhill County, more specifically in McMinnville, Oregon. I see patients from all walks of life and work to see any patient as soon as possible with a dental emergency.

HB 2528 provides great help for the underserved but appears to step into some dangerous territory of pain and irreversible conditions for patients with vague guidelines. Although many of the procedures listed are necessary for emergency care of patients, these often fall into the most crucial parts of dental expertise. A dental therapist would not be equipped to handle an extraction if a permanent tooth was not as "simple" as it appeared prior to extraction. On occasion the "periodontally diseased permanent teeth with advanced mobility" may have significant bleeding that requires post-op management that a dental therapist may not be equipped to handle.

Furthermore, HB 2528 does not define what "emergency palliative treatment of dental pain" is and thus opens up the ability to perform procedures at the dental therapist's discretion that may be otherwise outside their scope of treatment and training. This item is dangerously ambiguous and allows a lot of room for interpretation by the provider.

HB 2528 also contains directives on procedures that may contribute more pain and financial hardship to patients without the appropriate training for planning and treatment. This includes pulp capping, pulpotomies on primary teeth and tooth reimplantation.

Lastly, HB 2528 states 51% of a dental therapist practice must be limited to underserved populations as defined by OHA. According to OHA's website, most of the state of Oregon is an underserved area, excluding only parts of the city of Portland and Gilliam, Wheeler, and Deschutes Counties. This would allow therapists to provide treatment in almost all areas including the ones that are currently served well by licensed dentists. By not strictly limiting the dental therapists to the areas where they are needed most imperatively, they are likely to remain in the more appealing areas for the same reasons that other providers have chosen to do so. To make this bill its most functional it would be best to limit the dental therapists to the most underserved areas and re-evaluate for expansion in the future if access to licensed dentists becomes a more expansive problem.

HB 2528 gives better access to the underserved, however it continues to have areas of concern and a need for change before being passed to provide safe, appropriate care.

Sincerely,



Frances Golly, DDS  
McMinnville, Oregon

