

Dear House Committee on Behavioral Health and Health Care,

I am writing a letter in opposition to House Bill 3223. I am a dental professional and dental educator in Oregon. This bill, if passed, would prohibit the Oregon Board of Dentistry from requiring dental assistants to pass any type of written examination before becoming certified, including but not limited to any level of expanded functions dental assistant.

Additionally, the pathway proposed in the bill would require dental assistants to perform certain expanded functions prior to earning certification. This would allow dental assistants who have not received education and hands-on clinical training as well as those who have never demonstrated any type of competency to practice restorative and orthodontic functions on dental patients. This is dangerous for the profession and most notably for dental patients seeking care.

The Oregon Board of Dentistry has established rules which state “in order to take x-rays, perform general expanded functions (EFDA), perform expanded orthodontic functions (EFODA), perform restorative functions, perform preventive functions (EFPDA) or perform certified anesthesia functions, dental assistants in Oregon must first be certified in those procedures.” The certification process is performed by the Dental Assisting National Board (DANB). House Bill 3223 seeks to eliminate all written exams, including radiation health and safety as well as certification exams for professional credentials for dental assistants.

The mission of the Oregon Board of Dentistry is “to promote quality oral health care and protect all communities in the State of Oregon by equitably and ethically regulating dental professionals.” Furthermore, the goals of the Oregon Board of Dentistry are to “protect the public from unsafe, incompetent or fraudulent practitioners and to encourage licenses to practice safely and competently in the best interests of their patients”. The Oregon Board of Dentistry does this through:

- Setting education standards;
- Testing the competency of applicants through written and clinical examinations;
- Requiring continuing education of all licensees;
- Investigating complaints and enforcing the provisions of the Dental Practice Act and Rules of the Board;
- Communicating Board policies and other pertinent information to all licensees on a regular basis;
- Providing clear interpretation of Board statutes and rules to licensees and members of the public;
- Acting as a resource to dental consumers in determining the adequacy of their dental treatment;
- Working with other health care licensing boards, professional associations (at the local, state and the national level) and the educational system to develop partnerships for forging a viable health care delivery system.

House Bill 3223 violates the mission and goals of the Oregon Board of Dentistry. The bill is damaging to the entire dental community and the patients served. It jeopardizes the health and safety of dental patients and lowers the quality of patient care. Certification exams are in place to ensure safe practice and minimal competency required to perform particular skills and tasks. Furthermore, the bill undermines the expertise and decision-making authority of the Oregon Board of Dentistry.

House Bill 3223 unilaterally prohibits professional requirements for a critical member of the dental team without input from the dental community. It also hinders the dental profession from making decisions about dental assistant qualifications that are in the best interest of public health and safety. Eliminating professional requirements, as proposed by House Bill 3223, devalues the profession of dental assisting, while putting patients and dental providers at risk. I urge you to carefully consider what is best for the health and safety of Oregonians.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Jessica August".

Jessica August, CDA, RDH, BSDH, MSDH
Tigard, Oregon