

**TO:** House Committee on Behavioral Health & Health Care

**FROM:** Lisa J. Rowley, RDH, MS

**SUBJECT:** Opposition to House Bill 2996

**Date:** February 14, 2023

I am writing to you in **opposition to House Bill 2996** that if passed would prohibit the Oregon Board of Dentistry from requiring “a written examination for radiological proficiency” for dental assistants.

I am a dental hygienist and I have worked in dental assisting and dental hygiene education for more than 40 years, at times as a faculty member and at other times as a program director. I am currently a faculty member in the dental hygiene program at Pacific University.

The Oregon Board of Dentistry, by administrative rule, requires dental assistants to pass the written Radiation Health & Safety Exam before they can expose dental x-rays on patients in a dental office. The Radiation Health & Safety exam is administered by the Dental Assisting National Board, also known as DANB. The Radiation Health & Safety exam is designed to determine if the candidate meets the “minimum national standard for knowledge-based competence in radiation health and safety tasks critical to the health and safety of patients and dental healthcare personnel.”

The Oregon Board of Dentistry requires written examinations to ensure that dental assistants understand the “how” and “why” for the procedures that they perform on their patients. When dental assistants do not understand the how and why of what they do, it is easier for them to make mistakes and to take short cuts that could be harmful to themselves, their patients and their co-workers. Written examinations should not be viewed as an administrative barrier, but rather as an essential qualification to be a health care provider.

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.” One way that the Board does this is by adopting administrative rules to further interpret the law or to address issues that are not included in the law. These administrative rules are adopted through a formal rulemaking process that includes public hearings. The Oregon Board of Dentistry has adopted administrative rules that regulate dental assistants in Oregon. Proposed changes to these administrative rules should be pursued with the Board through their formal rulemaking process that allows interested stakeholders to have input on these changes.

In closing, I strongly urge you to **vote No on House Bill 2996**. The Oregon Board of Dentistry should be allowed to require written examinations to ensure that dental assistants understand the dental procedures that they are performing in order to protect the health & safety of themselves, their patients and their co-workers. And any changes to the Oregon Board of Dentistry’s administrative rules should be pursued through the Board’s administrative rulemaking process, and not through the legislature.

Thank you for considering this testimony.